

### **Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Based upon Plaintiff's Amended Complaint, and Disclosure of Asserted Claims and Infringement Contentions and claim charts, and the apparent claim constructions and applications of the claims to Defendants accused products and/or components, as best as they can be deciphered, the reference charted below anticipates or at least renders obvious the asserted claims. These invalidity contentions are not an admission by Defendants that the accused products or components, including any current or past version of these products or components, are covered by, or infringe the asserted claims, particularly when these claims are properly construed and applied. These invalidity assertions are also not an admission that Defendants concede or acquiesce to any claim construction(s) implied or suggested by Plaintiff in its Amended Complaint or the Disclosure of Asserted Claims and Infringement Contentions and claim charts. Nor are Defendants asserting any claim construction positions through these charts, including whether the preamble is a limitation. The portions of the prior art reference cited below are not exhaustive but are exemplary in nature.

The chart below discloses how prior art references identified by Defendants discloses, either expressly or inherently, and/or render obvious each of the asserted claims. The citations provided are exemplary and do not necessarily include each and every disclosure of the limitation in the references. Defendants have endeavored to cite to the most relevant portions of the identified prior art, but other portions of the identified prior art may additionally disclose, either expressly or inherently, and/or render obvious one or more limitations of the asserted claims. Thus, Defendants reserve the right to rely on: (1) uncited portions of the identified prior art; (2) other prior art not identified herein; (3) references that show the state of the art (irrespective of whether such references themselves qualify as prior art to the asserted patents); (4) factual testimony from the inventors or authors of the prior art references, or purveyors of prior art devices; and/or (5) expert testimony, to provide context to or aid in understanding the prior art and the state of the art at the time of the alleged inventions.

The lack of a citation for an element should not be deemed an admission that the element is not disclosed or is not inherent in the reference. When the chart indicates a particular reference discloses or embodies a limitation, the terms "discloses," "disclosed," "embodies," and "embodied" refer to explicit and/or inherent disclosure and/or obvious variations of the actual disclosure. Further, due to the insoluble ambiguity of certain claims and claim limitations, Defendant has, in some instances, used its best efforts to reasonably interpret the claims to fulfill their duties in charting the prior art references.

Where Defendants cite to a particular drawing or figure in the accompanying charts, the citation encompasses the description of the drawing or figure, as well as any text associated with the drawing or figure. Similarly, where Defendants cite to particular text concerning a drawing or figure, the citation encompasses that drawing or figure as well. Certain identified prior art inherently discloses features of the asserted claims. Defendants reserve the right to rely on inherency to demonstrate the invalidity of the asserted claims. Moreover, certain prior art references may inherently disclose certain features of the asserted claims as construed by Plaintiff. Defendants may rely on cited or uncited portions of the prior art, other documents, factual testimony, and expert testimony to establish the inherency of certain features of the prior art to invalidate the asserted claims.

### **Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

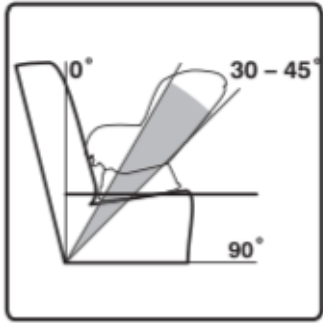
Defendants contend that one of ordinary skill in the art at the time of the purported invention would have been motivated to combine one or more of the identified references together. In general, a motivation to combine any of the identified references with others exists within the references themselves, as well as within the knowledge of those of ordinary skill in the art. These references identify and address the same technical issues and suggest similar solutions to those issues. Additionally, a person of ordinary skill in the art at the time of the purported invention would have been motivated to combine the prior art references identified by (i) his or her education and experience, (ii) the state of the prior art as a whole, (iii) the nature of the problem to be solved, (iv) common knowledge in the art, (v) common sense, (vi) design incentives, (vii) market forces, and/or (viii) a desire to tailor a solution using all of the skills and knowledge at his or her disposal. *See, e.g., KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727 (2007); *Examination Guidelines for Determining Obviousness Under 35 U.S.C. §103 in View of the Supreme Court Decision in KSR Int'l v. Teleflex, Inc.*, Fed. Reg. 57526 (Oct. 10, 2007).

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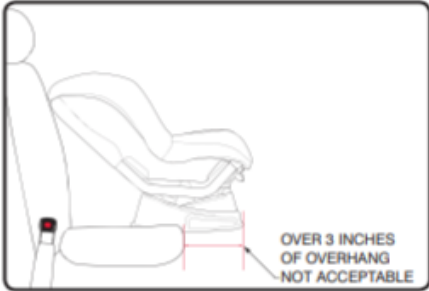

The following list illustrates the grounds for invalidity:

- Britax Child Safety, Inc., *Britax Boulevard 70 CS User Guide*, (2011) [https://us.britax.com/media/7420/p473100\\_r1\\_blvd\\_cs\\_us\\_web.pdf](https://us.britax.com/media/7420/p473100_r1_blvd_cs_us_web.pdf), *Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs*, YouTube (Jan. 6, 2011) <https://www.youtube.com/watch?v=OrL4oZaEwuk>, *Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs*, YouTube (Jan. 6, 2011), <https://www.youtube.com/watch?v=I1gD5S-9NFE&t=59s>, (collectively, “Boulevard 70 CS”) anticipates claims 1-15.
- *Boulevard 70 CS* renders obvious claims 1-15.
- *Boulevard 70 CS* in combination with U.S. Patent No. 6,508,510 B2 (“*Yamazaki*”), Japanese Laid-open Patent Publication No. H5-185869 (“*Washimi*”), European Patent Application No. EP0822115A2 (“*Wetter*”), the Uppa Baby Mesa Instruction Manual (“*Uppa Baby Mesa*”), the Britax B-Safe 35 User Guide (“*B-Safe 35*”) U.S. Patent No. 8,322,788 B2 (“*Williams*”) and/or the Graco Smart Seat Owner’s Manual (“*Graco Smart Seat*”) renders obvious claims 1-15.

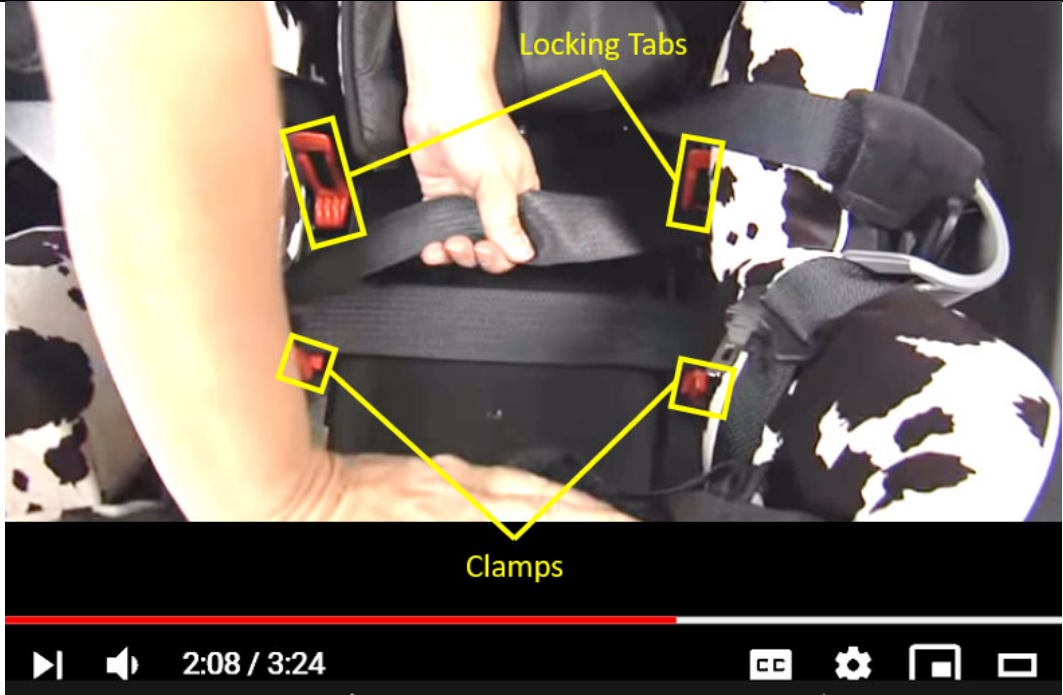
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
[1(p)] A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat, the child seat comprising:	<p><i>Boulevard 70 CS</i> discloses or renders obvious a child seat configured to be secured to a vehicle seat in both a rear-facing and front-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 15; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p align="center"><i>Id.</i>, p. 15.</p>


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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 20px;">  </div> <p align="right"><i>Id.</i>, p. 15.</p>

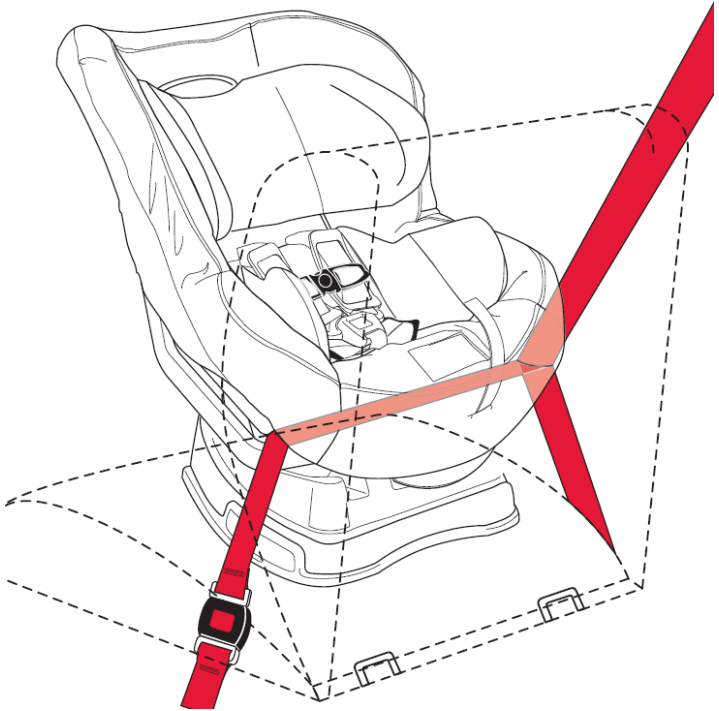
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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>The video frame shows a person's hands installing a car seat. A black seat belt is being threaded through a car seat. Four yellow boxes highlight specific components: two labeled 'Locking Tabs' and two labeled 'Clamps'. The video player interface at the bottom shows a progress bar at 2:08 / 3:24 and standard controls.</p>
	<i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

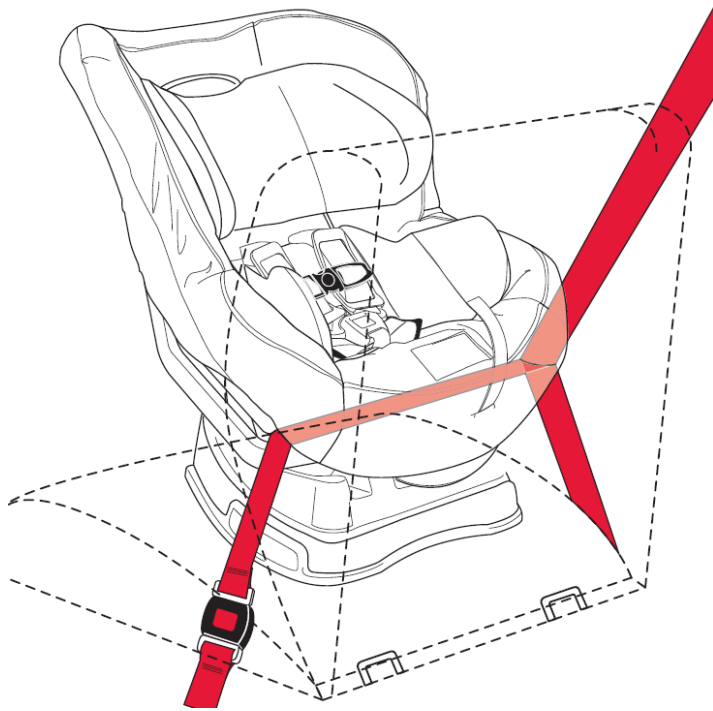
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(a)(1)] a seat base comprising a seat portion, a backrest portion,	<p><i>Boulevard 70 CS discloses or renders obvious a seat base comprising a seat portion and a backrest portion. Boulevard 70 CS User Guide, p. 22.</i></p>

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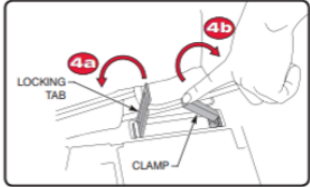


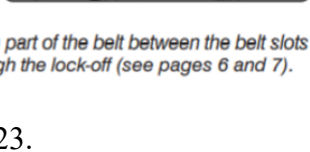
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="center"><i>Id., p. 22.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(a)(2)] first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions,	<p><i>Boulevard 70 CS</i> discloses or renders obvious first and second lateral edges that protrude forwardly and upwardly from the seat and backrest portions. <i>Boulevard 70 CS User Guide</i>, p. 22.</p>



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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="center"><i>Id.</i>, p. 22.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(a)(3)] a first belt path generally at a middle of the seat portion in a	<p><i>Boulevard 70 CS</i> discloses or renders obvious a first belt path generally at a middle of the seat portion in a forward and rearward direction. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
forward and rearward direction,	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>    

*Id.*, p. 23.

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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(a)(4)] and a second belt path generally at an intersection of the seat and backrest portions; and	<p><i>Boulevard 70 CS discloses or renders obvious a second belt path generally at an intersection of the seat and backrest portions. Boulevard 70 CS User Guide, p. 29; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

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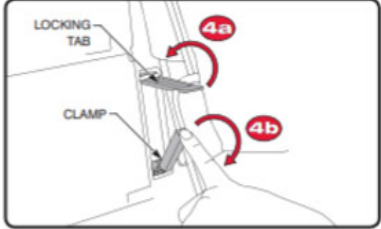
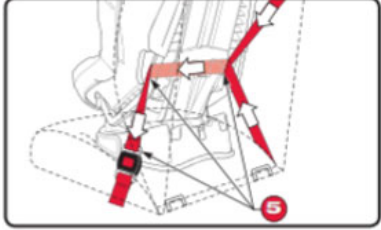

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p> <div data-bbox="1283 367 1661 594"> <p>Diagram 4a shows a hand opening a locking tab. Diagram 4b shows a hand opening a clamp. Labels include 'LOCKING TAB' and 'CLAMP'.</p> </div> <div data-bbox="1283 613 1661 841"> <p>Diagram 5 shows a child in a car seat with a red vehicle belt being routed through the forward-facing belt slots. A red circle with the number 5 is in the bottom right corner.</p> </div> <div data-bbox="1283 860 1661 1088"> <p>Diagram 7 shows a hand pushing down into the middle of the child seating area while pulling the top (shoulder) part of the belt. A red circle with the number 7 is in the bottom right corner.</p> </div>

*Id.*, p. 29.

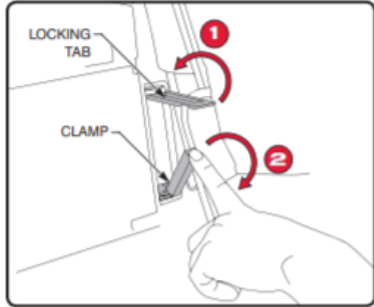
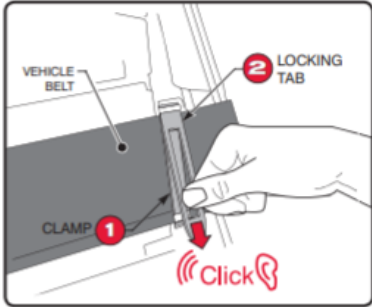
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(b)(1)] a tensioning mechanism attached to the seat base to be movable between a first position and a second position,	<p><i>Boulevard 70 CS discloses or renders obvious a tensioning mechanism attached to the seat base to be movable between a first position and a second position. Boulevard 70 CS User Guide, p. 29; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p> <p align="right"><i>Id., p. 29.</i></p>   

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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>



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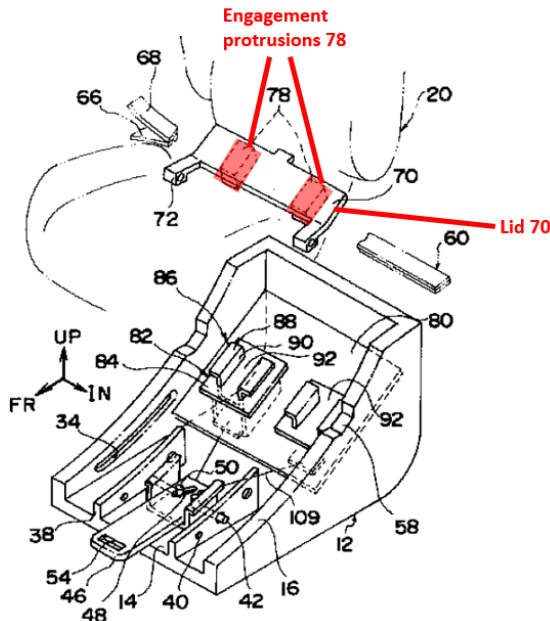
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>’s tensioning mechanism. Furthermore, although <i>Yamazaki</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Yamazaki</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Yamazaki</i> discloses:</p> <p>“The base 10 is fastened to the passenger seat 7 by a lap-and-diagonal seat belt 4. The seat belt 4 has a diagonal section 4a extending between a tongue plate 5 (FIG. 5) to be engaged with a latch</p>



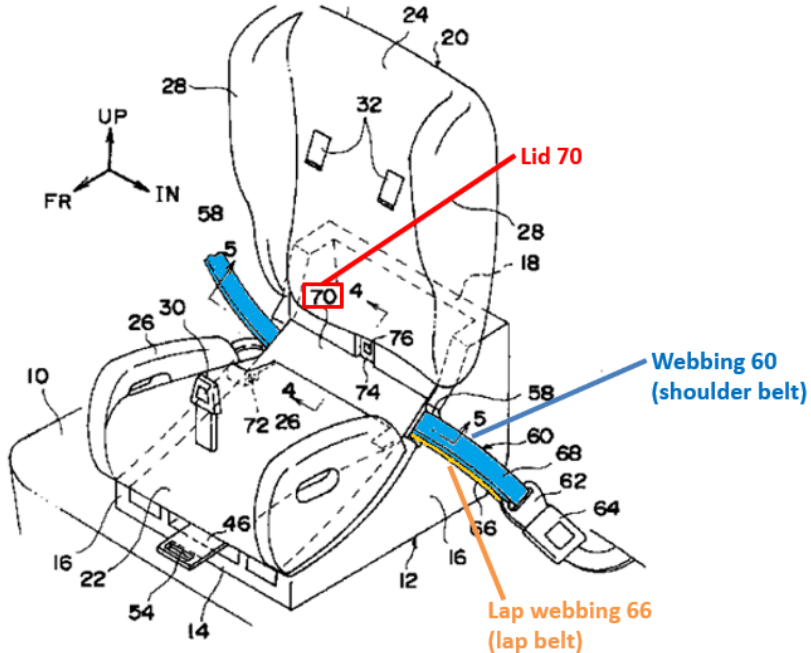
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Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	<p data-bbox="1184 293 1314 326"><b>Prior Art</b></p> <p data-bbox="669 342 1892 448">6 (FIG. 5) connected to the floor of the vehicle and a retractor (not shown), and a lap section 4b extending between the tongue plate 5 (FIG. 5) and an anchor (fixed member) 9 (FIG. 5).”  <i>Yamazaki</i>, 3:30-36.</p> <p data-bbox="669 488 1913 594">“Step 1: The base 10 is set on the passenger seat 7 of the vehicle. Step 2: The tongue plate 5 of the seat belt 4 is engaged with the latch 6 with the lap section 4b of the seat belt 4 extended under the lever 12 of the seat belt tightening mechanism 11.” <i>Id.</i>, 4:27-32.</p> <div data-bbox="842 667 1640 1235"> <p>FIG. 1</p> <p><i>Id.</i>, Fig. 1.</p> </div>

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	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>In another alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Washimi</i>’s tensioning mechanism. Furthermore, although <i>Washimi</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Washimi</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Washimi</i> discloses:</p> <p>“In the straddle part 56, the webbing 60 is positioned with the lap webbing 66 and shoulder webbing 68 stacked together in a state where the tongue plate 62 is engaged with the buckle device 64.” <i>Washimi</i>, ¶[0023].</p>  <p><i>Id.</i>, Fig. 1 (annotated).</p>

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Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1100 1052 1388 1084"><i>Id.</i>, Fig. 2 (annotated).</p> <p data-bbox="575 1127 1902 1305">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Wetter</i>’s tensioning mechanism. Furthermore, although <i>Wetter</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Wetter</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Wetter</i> discloses:</p> <p data-bbox="669 1344 1881 1446">“During installation, both the lap and shoulder portions of an adult seat belt 136 for the vehicle seat 128, 130 are engaged round the belt guides 134 as shown in Figure 10. Next, a U-shaped strap deflecting member 138, which has its ends pivotally engaging in holes 140 and 142 in</p>

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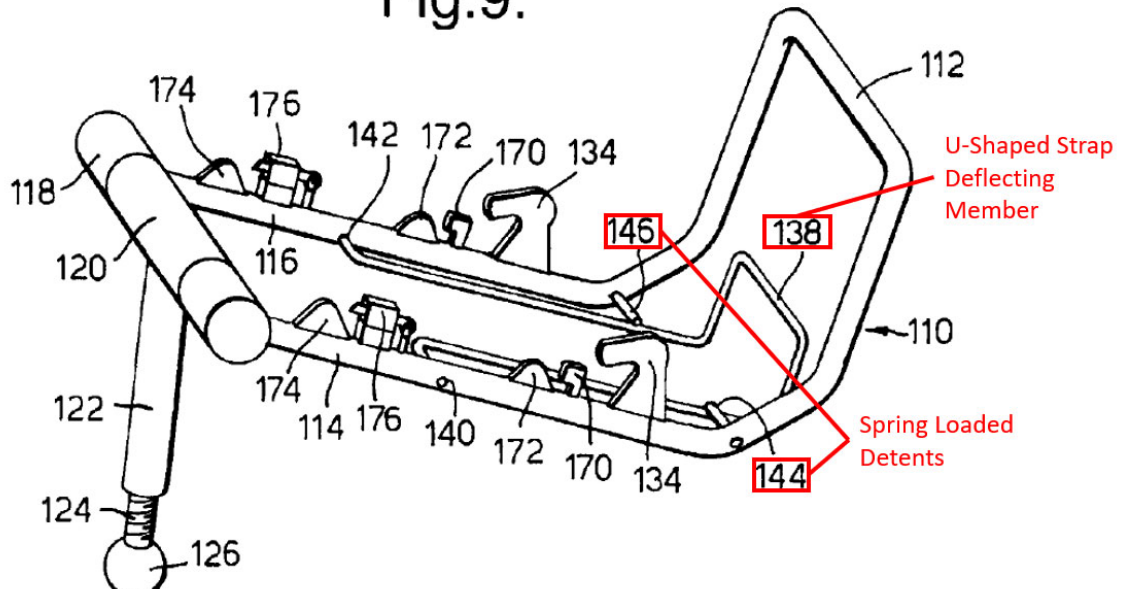
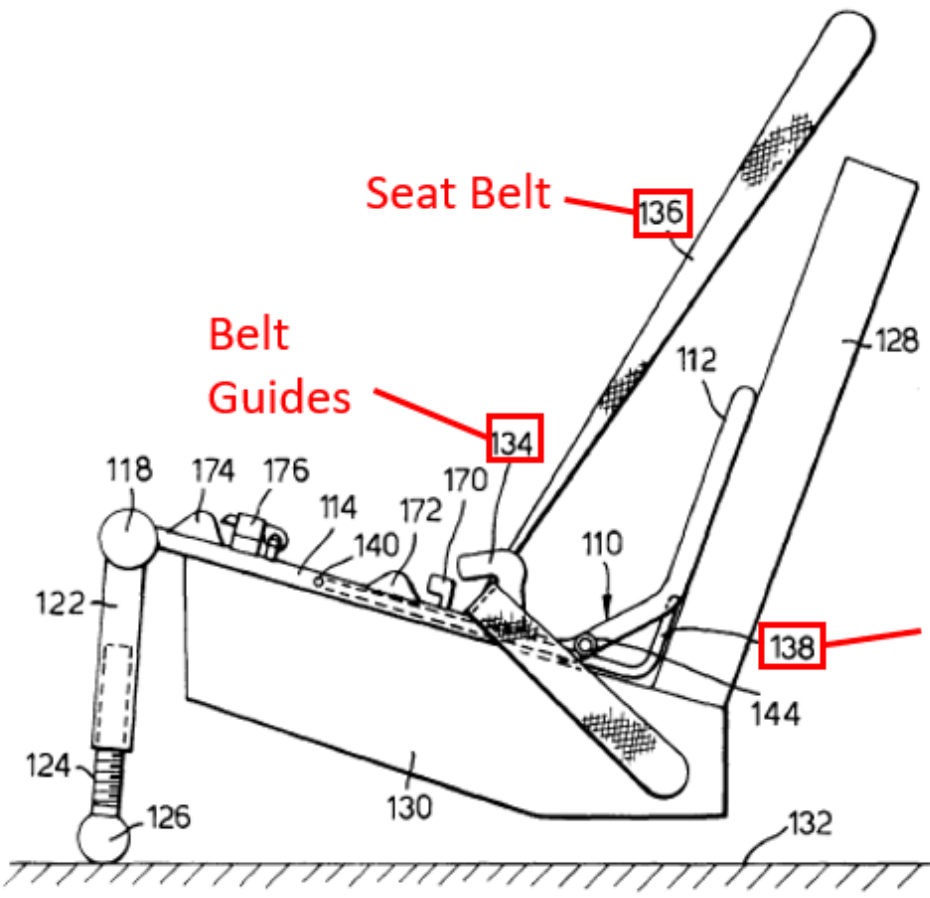
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>the side limbs 114 and 116 of the base member, is pivoted downwardly from the position shown in Figure 10 to the position shown in Figure 11 in which it deflects the adult seat belt 136 downwardly between the belt guides 134, thereby tightening the belt 136 and compressing the springs of the seat cushion 130 of the vehicle seat. The deflection member 138 is held in the position shown in Figures 9 and 11 (in which it lies substantially parallel to the limbs 114 and 116 of the base member) by springloaded detents 144 and 146 on the base member 110 adjacent to the junctions between the central portion 112 and the end portions 114 and 116 respectively.”  <i>Wetter</i>, 5:6-23.</p> <p style="text-align: center;"><b>Fig.9.</b></p>  <p style="text-align: right;">U-Shaped Strap Deflecting Member</p> <p style="text-align: right;">Spring Loaded Detents</p> <p style="text-align: center;"><i>Id.</i>, Fig. 9 (annotated).</p>

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Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>Fig.10.</p> <p>The diagram illustrates a seat belt assembly (136) mounted on a vehicle seat (128). A U-shaped strap deflecting member (138) is positioned to guide the seat belt. Belt guides (134) are located along the path of the seat belt. The assembly includes various components labeled with reference numerals: 110, 112, 114, 118, 122, 124, 126, 130, 132, 140, 144, 170, 172, 174, and 176. The seat belt (136) is shown in a retracted position, passing over the deflecting member (138) and guided by the guides (134). The entire assembly is mounted on a base (130) which is secured to the seat frame (128) via a pivot (122) and a spring (124). A handle (118) is provided for manual operation of the assembly.</p> <p>U-Shaped Strap Deflecting Member 138</p> <p>Seat Belt 136</p> <p>Belt Guides 134</p> <p>Id., Fig. 10 (annotated).</p>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1087 1299 1396 1339"><i>Id.</i>, Fig. 10 (annotated).</p> <p data-bbox="577 1372 1900 1445">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70</i></p>

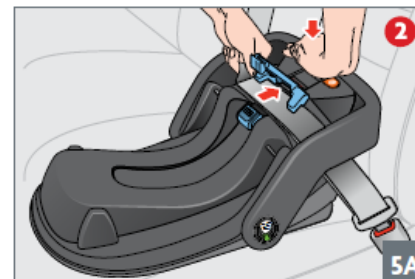
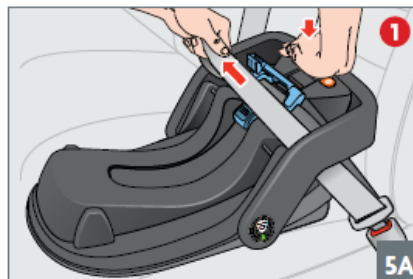
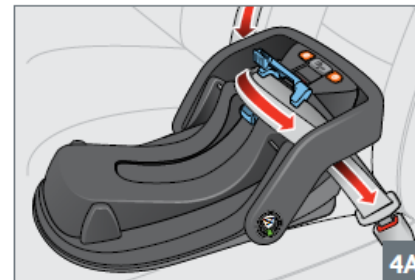
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<i>CS with Uppa Baby Mesa's tensioning mechanism. Furthermore, although Uppa Baby Mesa teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate Uppa Baby Mesa's tensioning mechanism into Boulevard 70 CS's child seat. For example, literature disclosing the Uppa Baby Mesa discloses:</i>



## SECURING THE BASE (LAP AND SHOULDER BELT INSTALLATION)

**STEP 4A:** Route the vehicle belt through the belt path while guiding the lap portion of the belt as close as possible to the top of the lock-off where the door hinges. Buckle the vehicle belt.



**STEP 5A:** Hold shoulder portion of belt above base. With one hand push down base in the direction of the seat bight (crease of seat) and hold firm as you pull shoulder belt **1**. While holding taut, slide shoulder belt back through the belt path as close as possible to the top of the lock-off **2**.

**NOTE: TIGHTNESS INDICATOR SHOULD BE GREEN.**



**STEP 6A:** Close the lock-off door.

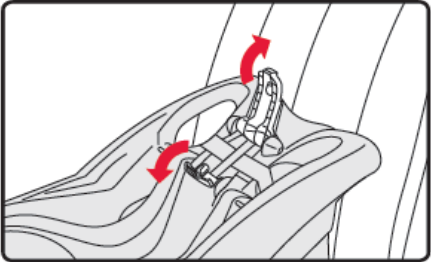
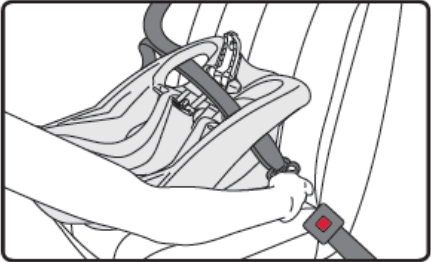

**NOTE:** Check that the belt doesn't move more than 1 inch at belt path. If you are having trouble achieving a secure installation in the center seat position, please install using the locking clip (pg. 28).



BASE INSTALLATION WITH VEHICLE SEAT BELT

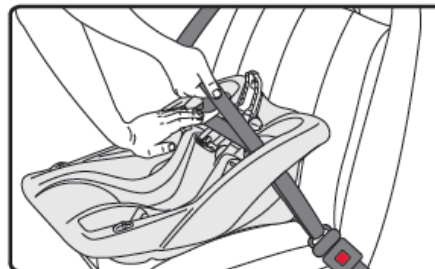


# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

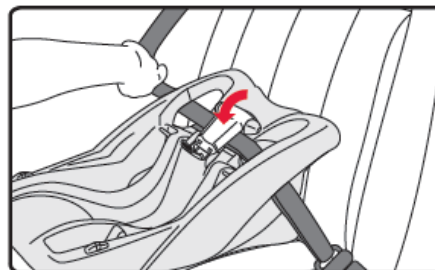
Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	<p data-bbox="961 342 1528 375">Uppa Baby Mesa Instruction Manual, p. 23.</p> <p data-bbox="573 415 1915 630">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>B-Safe 35</i>’s tensioning mechanism. Furthermore, although <i>B-Safe 35</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>B-Safe 35</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Boulevard 70 CS</i> discloses:</p> <div data-bbox="831 672 1272 841"> <ul style="list-style-type: none"> <li>• Place the base in the desired location on the vehicle seat and open the upper and lower portions of the lock-off.</li> <li>• Pull the vehicle seat belt out.</li> </ul> </div> <div data-bbox="1289 675 1717 935">  </div> <div data-bbox="831 951 1268 1221"> <ul style="list-style-type: none"> <li>• Ensure that the vehicle seat belt is not twisted and then route the vehicle belt under and through the first belt guide, through the open lock-off and down through the second belt guide.</li> <li>• Buckle the vehicle seat belt.</li> </ul> </div> <div data-bbox="1289 951 1717 1211">  </div> <div data-bbox="743 1243 827 1299">  </div> <p data-bbox="1016 1312 1478 1344">Britax B-Safe 35 User Guide, p. 16.</p>

### Installing the Base

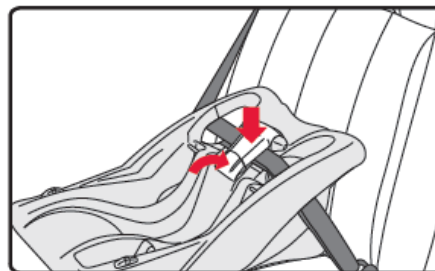
- Press the base firmly into the vehicle seat while removing all slack from first the lap portion and then the shoulder portion of the vehicle seat belt.



- Hold the vehicle belt tight and close the upper portion of the lock-off.



- Press firmly on the upper portion of the lock-off and close the lower portion to secure.

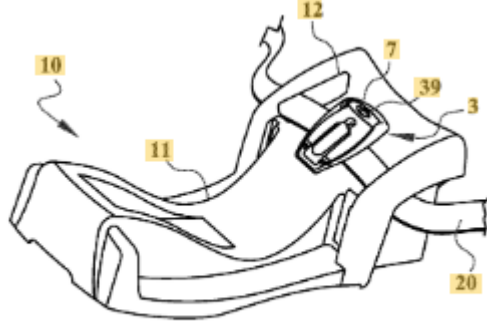
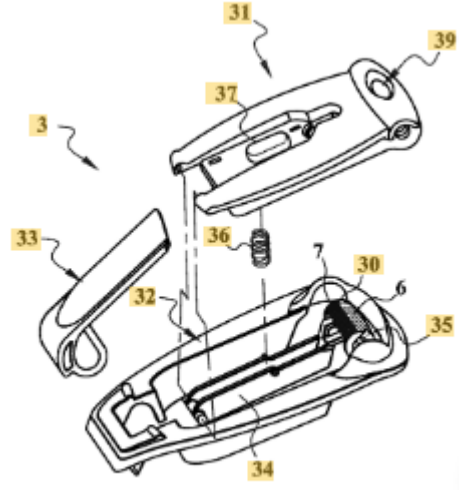


- Verify that the vehicle belt is tight and that the base is secure. The base is secure when it moves less than 1 inch (2.5 cm) front-to-back or side-to-side at the vehicle belt path.
- Correct recline angle is achieved when the green marker on each recline angle indicator is visible between the two lines.

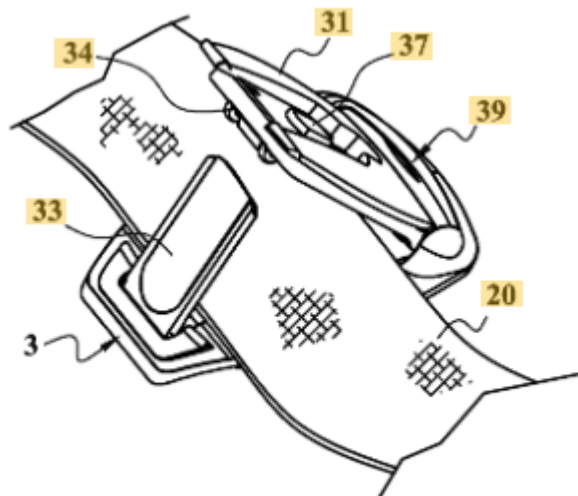
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p align="center"><i>Id.</i>, p. 17.</p> <p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Williams</i>’s tensioning mechanism. Furthermore, although <i>Williams</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Williams</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Williams</i> discloses:</p> <p>“Referring to FIG. 1, the base 10 may be formed integrally in one piece or an assembly of multiply piece, having a curved supporting surface 11 for support a infant travel seat thereon and a pair of side guiding openings 12 for allowing a belt passing therethrough so as to secure the base 10 to the vehicle seat. Referring to FIGS. 2 and 3, the biting compartment 32 is formed on the base 10 between the pair of side guiding openings 12 where the belt 20 could pass is passing thereover. The covering plate 31 has one end coaxial with the colored rotor 35 and pivoted to one end of the biting compartment 32 for closing the biting compartment 32 when being rotated to a closed position, and another end pivoted with a rotatable depressor 34 for pressing the belt 20 into the biting compartment 32 when the covering plate 31 is rotated to and positioned in the closed position. [P]referably, a resilient element 36 may be mounted between the covering plate 31 and the rotatable depressor 34, so as to keep the rotatable depressor 34 in an opened position. In one embodiment, the resilient element 36 is a compression spring for biasing the rotatable depressor 34 downward and keeping in the opened position. When the covering plate 31 is carrying the rotatable depressor 34 to press the belt 20, it would compress the resilient element 36 and cause the rotatable depressor 34 to rotate and close to the covering plate 31 to a closed position.” <i>Id.</i>, 2:49-3:7.</p> <p>“Referring to FIGS. 5 and 6, before tying the base <b>10</b> to a vehicle seat, the belt <b>20</b> is passing through the pair of side guiding openings <b>12</b> and secure its free end to an anchor which is</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>mounted within the vehicle seat. By this way, may secure the base <b>10</b> to the vehicle seat tightly.” <i>Id.</i>, 3:41-45.</p> <p>“In order to inhibit the sliding between the base <b>10</b> and belt <b>20</b>, the user may rotate the covering plate <b>31</b> to close the biting compartment <b>32</b>, thus would carry the rotatable depressor <b>34</b> to press the belt <b>20</b> into the biting compartment <b>32</b>. After being closed the covering plate <b>31</b>, the user may rotate the holding plate <b>33</b> to engage and lock the covering plate <b>31</b> in the closed position.” <i>Id.</i>, 3:16-52.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p align="center"><b>FIG. 1</b> <span style="margin-left: 200px;"><b>FIG. 2</b></span></p> <p align="center"><i>Id.</i>, FIGS. 1, 2.</p>

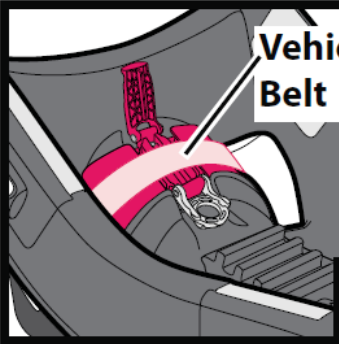
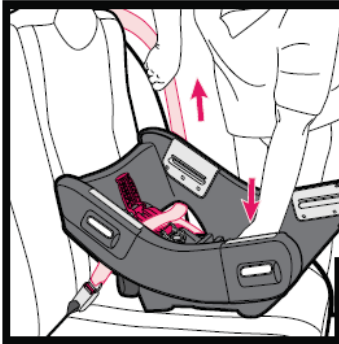


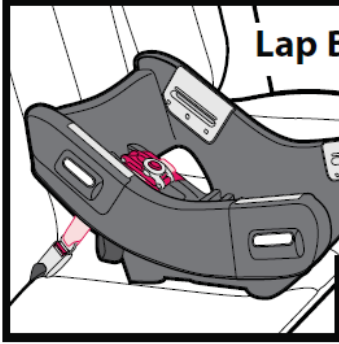
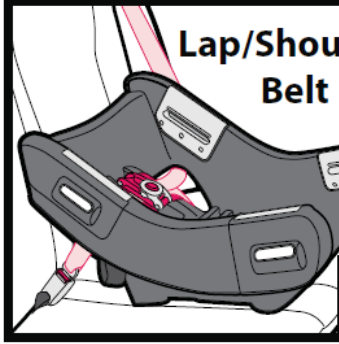
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p style="text-align: center;"><b>FIG. 5</b></p> <p style="text-align: center;"><i>Id.</i>, FIG. 5.</p> <p>In a further alternative, to the extent <i>the Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Graco Smart Seat</i>’s tensioning mechanism. Furthermore, although <i>Graco Smart Seat</i> teaches a tensioning mechanism attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Graco Smart Seat</i>’s tensioning mechanism into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Graco Smart Seat</i> discloses:</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>When using the vehicle seat belts to install the base, the lock-off is <b>ALWAYS</b> used to secure both belts of the lap or lap/shoulder belt.</p> <ol style="list-style-type: none"> <li>1. Position base in vehicle seat as shown <b>C</b>.</li> <li>2. Open the lock-off and route the vehicle belt through the belt path and over the lock-off <b>D</b>.</li> <li>3. Buckle seat belt. Pull up on shoulder belt while pushing down on base to tighten <b>E</b>.</li> <li>4. Close lock-off <b>F</b>.</li> <li>5. Test base for secure installation by moving front to back and left to right at the belt path <b>G</b>. Base should not move more than 1 inch ( 2.54 cm). If belt loosens or lengthens, repeat procedure.</li> </ol> <p>Lap Belt <b>H</b> and Lap/Shoulder Belt <b>I</b> should appear as shown when installed.</p> <p align="center"><b>30</b></p> <p align="center"><i>Graco Smart Seat Owner’s Manual, p. 30.</i></p>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

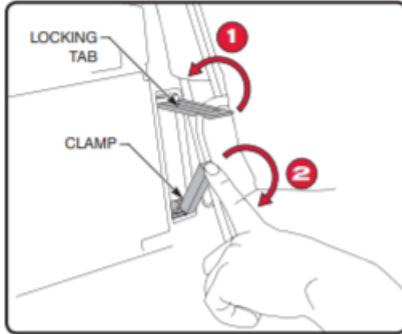
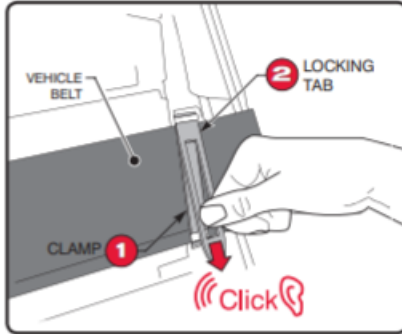
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<div data-bbox="590 347 1005 688">  <p><b>D</b></p> </div> <div data-bbox="1037 347 1453 688">  <p><b>E</b></p> </div> <div data-bbox="1484 347 1900 688">  <p><b>F</b></p> </div> <div data-bbox="590 704 1005 1045">  <p><b>G</b></p> </div> <div data-bbox="1037 704 1453 1045">  <p><b>H</b></p> </div> <div data-bbox="1484 704 1900 1045">  <p><b>I</b></p> </div> <div data-bbox="1249 1062 1312 1110" style="text-align: center;"> <p><b>31</b></p> </div> <div data-bbox="1171 1143 1312 1192" style="text-align: center;"> <p><i>Id.</i>, p. 31.</p> </div> <div data-bbox="575 1224 1900 1435"> <p>One of ordinary skill in the art would have been motivated to combine <i>the Boulevard 70 CS</i> with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i>, and/or <i>Graco Smart Seat</i> because these references teach systems securing child seats to vehicle seats using securing mechanisms. The <i>Boulevard 70 CS</i> uses a tensioning mechanism to ensure “that the child seat cannot be moved front to back or side to side more than 1 in. (2.5 cm) at the belt path. If the child seat is not secure, repeat installation or use a different seating location.” <i>Boulevard CS 70 User Guide</i>, p. 21, 23, 25, 27, 29, 31.</p> </div>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

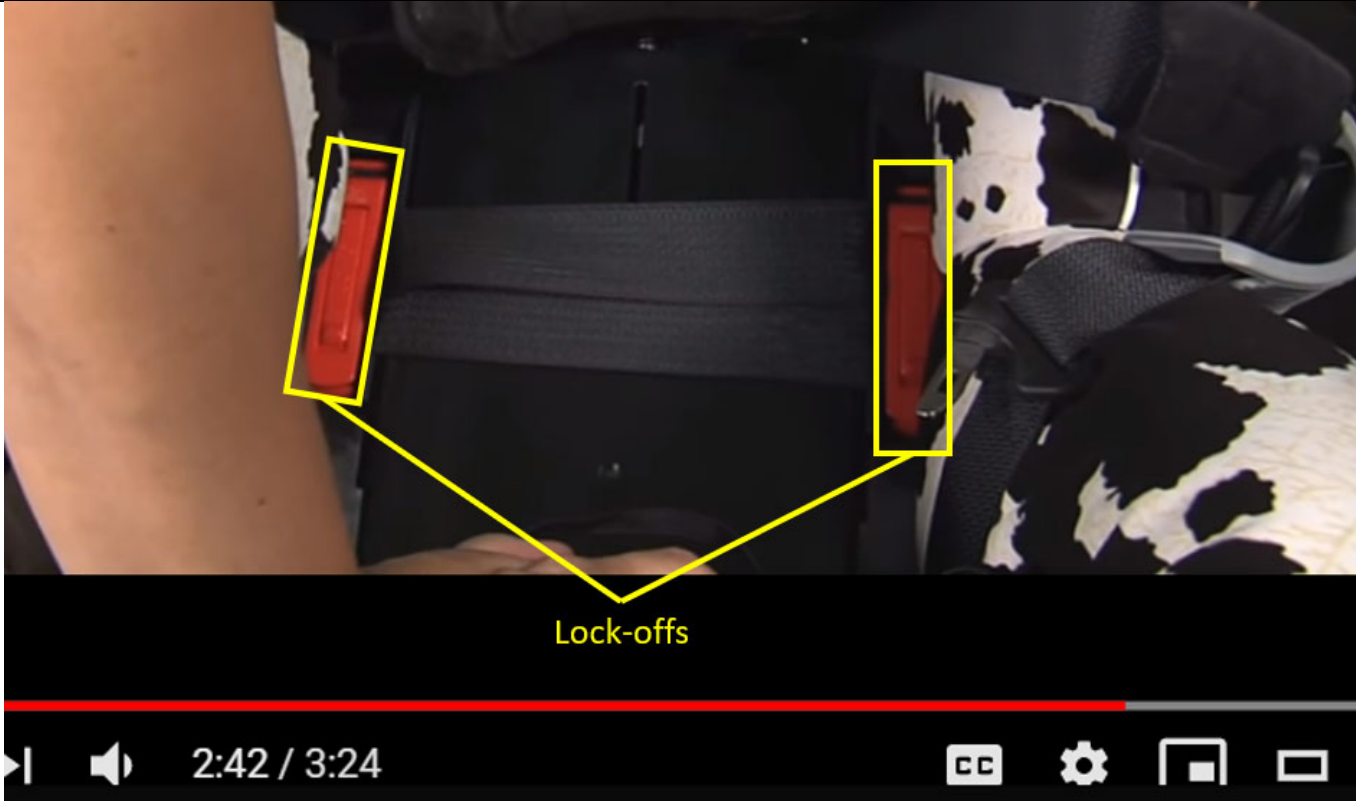
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>As identified, the installation of <i>Boulevard 70 CS</i>'s child seat can sometimes result in loose installations. <i>Id.</i> Therefore, a person of ordinary skill in the art would have looked to improve <i>Boulevard CS 70</i>'s locking tabs with one of the tensioning mechanisms disclosed in <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(b)(2)] the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism rotates between the first position and the second position pivotally about the axis, and	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism rotates between the first position and the second position pivotally about the axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



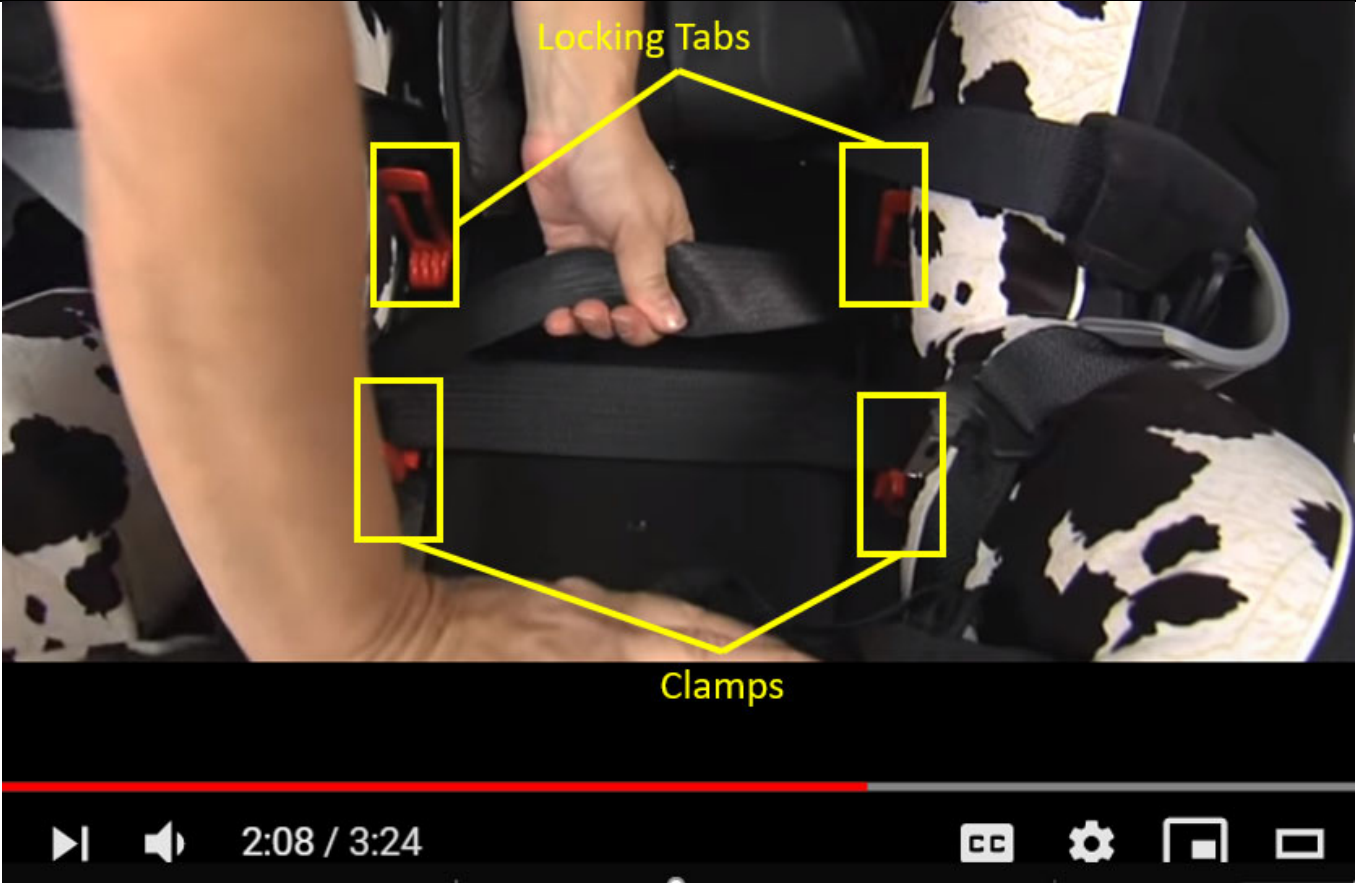
Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

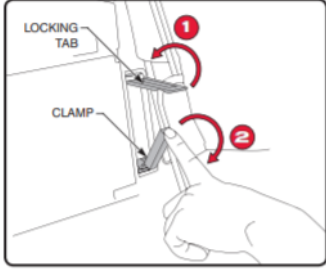
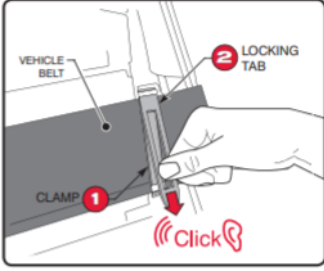
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

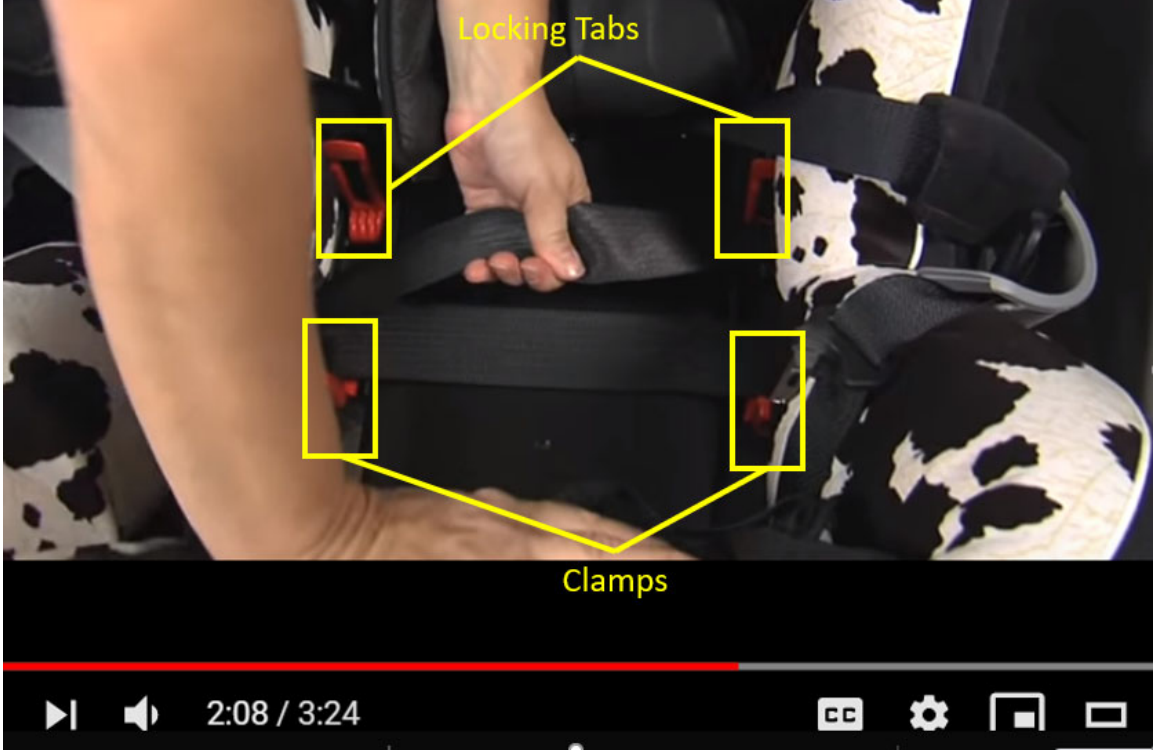
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>The video frame shows a person's hands installing a car seat. A yellow line connects four yellow boxes to the text 'Locking Tabs' at the top. The boxes highlight red locking tabs on the seat belt. Another yellow line connects two yellow boxes to the text 'Clamps' at the bottom. The boxes highlight red clamps on the seat belt. The video player interface at the bottom shows a progress bar at 2:08 / 3:24 and icons for play, volume, closed captions, settings, and full screen.</p> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>[1(b)(3)] wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface, the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism has a first lateral edge surface and a second lateral edge surface, the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off</i>.</p> <div data-bbox="892 537 1591 1174"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div data-bbox="892 662 1222 1027"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1264 662 1591 1096"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <div data-bbox="877 1133 968 1174"> <p>14</p> </div> </div> <p><i>Id.</i>, p. 14.</p>

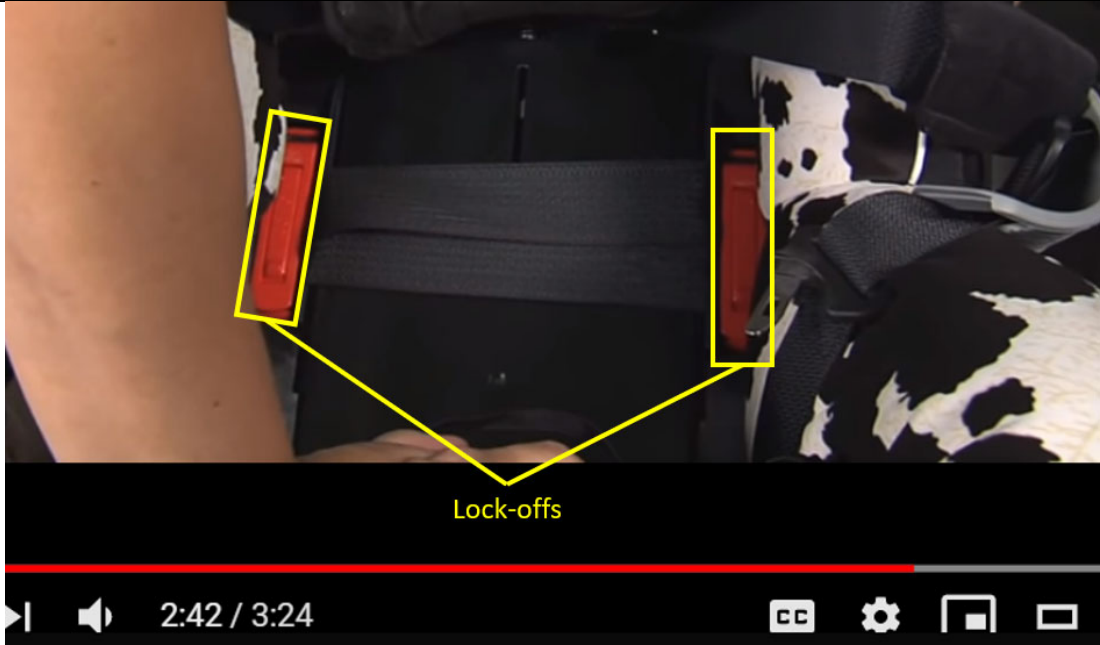
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(b)(4)] wherein in the first position, the tensioning mechanism is	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the tensioning mechanism is substantially adjacent to the seat base. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off</i>.</p>

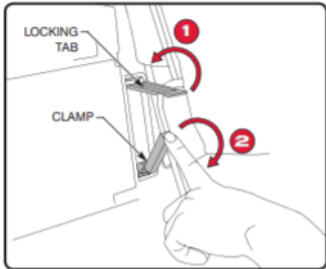
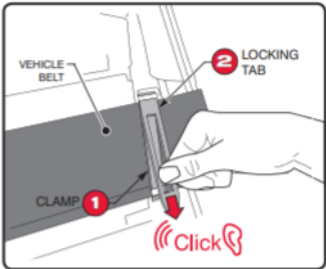

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>substantially adjacent to the seat base, and</p>	<div data-bbox="898 386 1591 418" data-label="Section-Header"> <p><b>Using the Lock-Offs</b></p> </div> <div data-bbox="898 440 1591 488" data-label="Text"> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> </div> <div data-bbox="898 516 1003 548" data-label="Section-Header"> <p><b>To Open:</b></p> </div> <div data-bbox="898 553 1222 820" data-label="Image"> <p>The diagram shows a hand operating a lock-off mechanism. A red arrow labeled '1' indicates the locking tab being moved upwards. A second red arrow labeled '2' indicates the clamp being moved away from the tab.</p> </div> <div data-bbox="919 829 1157 878" data-label="List-Group"> <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1266 516 1371 548" data-label="Section-Header"> <p><b>To Close:</b></p> </div> <div data-bbox="1266 553 1591 820" data-label="Image"> <p>The diagram shows a hand closing the lock-off. A red arrow labeled '1' indicates the clamp being moved over the vehicle belt. A second red arrow labeled '2' indicates the hand sliding along the locking tab. A red 'Click' sound effect is shown at the end of the stroke.</p> </div> <div data-bbox="1287 829 1581 943" data-label="List-Group"> <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <div data-bbox="877 982 968 1024" data-label="Image"> </div> <div data-bbox="1182 1036 1308 1073" data-label="Text"> <p><i>Id.</i>, p. 14.</p> </div>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

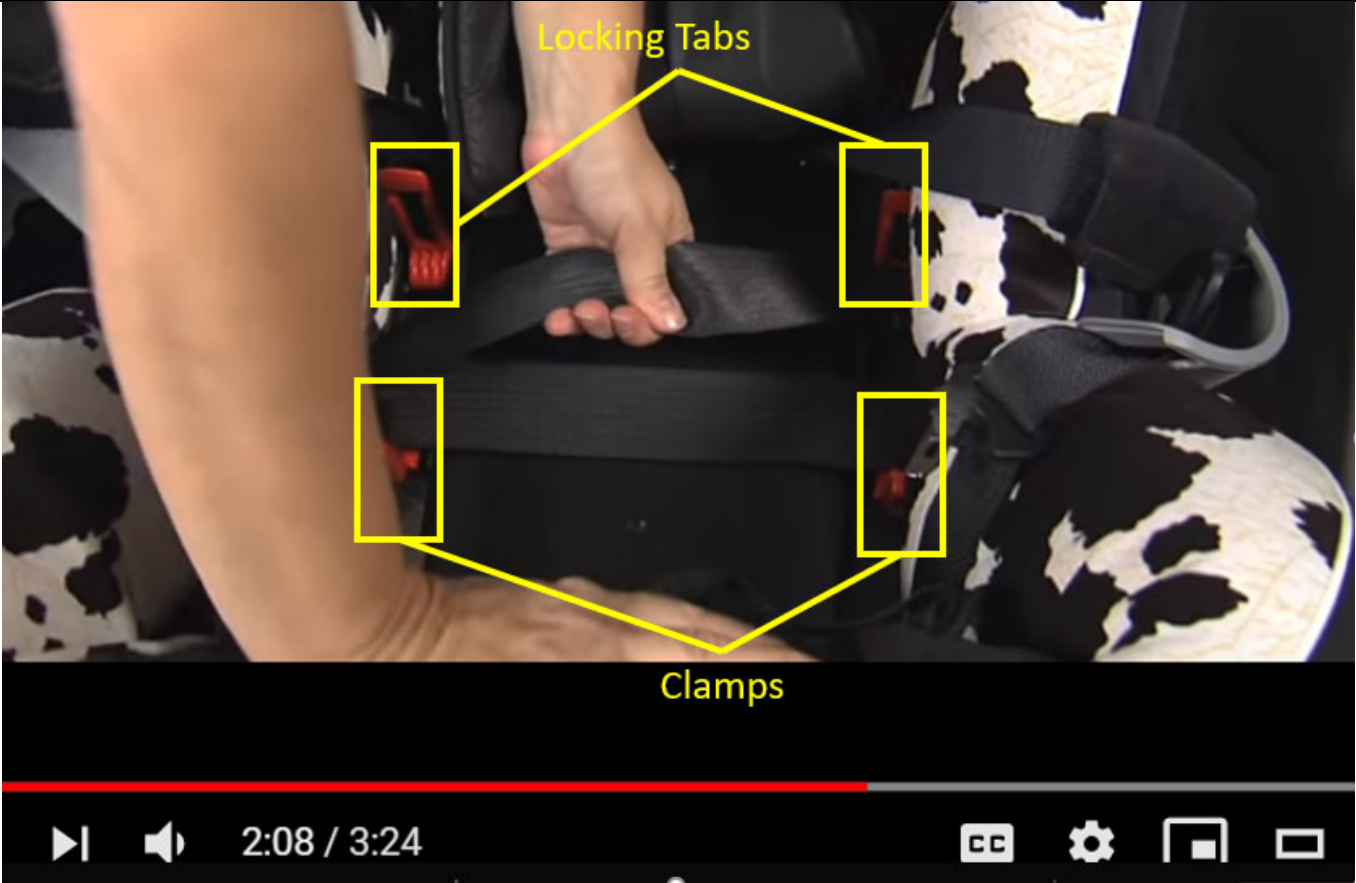
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(b)(5)] wherein in the second position, the tensioning mechanism is at least partly displaced from the seat base in order to enable at least one of the first belt path or the	<p><i>Boulevard 70 CS discloses or renders obvious the seat base is configured to receive a belt of the vehicle seat in an untensioned state to secure the child seat to the vehicle seat in an untensioned configuration. Boulevard 70 CS User Guide, p. 14; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off.</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

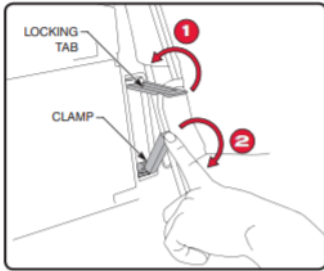
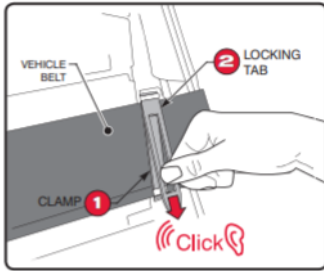

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
second belt path to receive the belt;	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;">    <i>Boulevard CS 70 User Guide, p. 14.</i> </p>




**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>The video frame shows a person's hands installing a car seat. A black seat belt is being threaded through a car seat. Four yellow boxes highlight specific components: two at the top labeled 'Locking Tabs' and two at the bottom labeled 'Clamps'. A yellow line connects the 'Locking Tabs' boxes to the 'Clamps' boxes. Below the video frame is a black control bar with a red progress line, play/pause, volume, and time (2:08 / 3:24) icons, and icons for closed captions, settings, and full screen.</p> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>

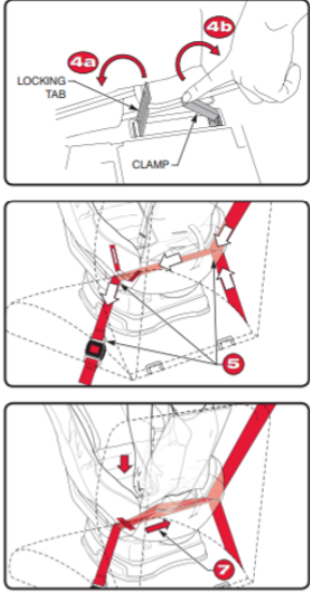
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
[1(c)(1)] wherein the first belt path is configured to allow a user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path is configured to allow a user to position the belt to be displaced by the first and second lateral edge surfaces relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Off</i>.</p> <hr/> <p align="center"><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <div style="text-align: center; margin-top: 20px;">  </div> <p align="right"><i>Id.</i>, p. 14.</p>

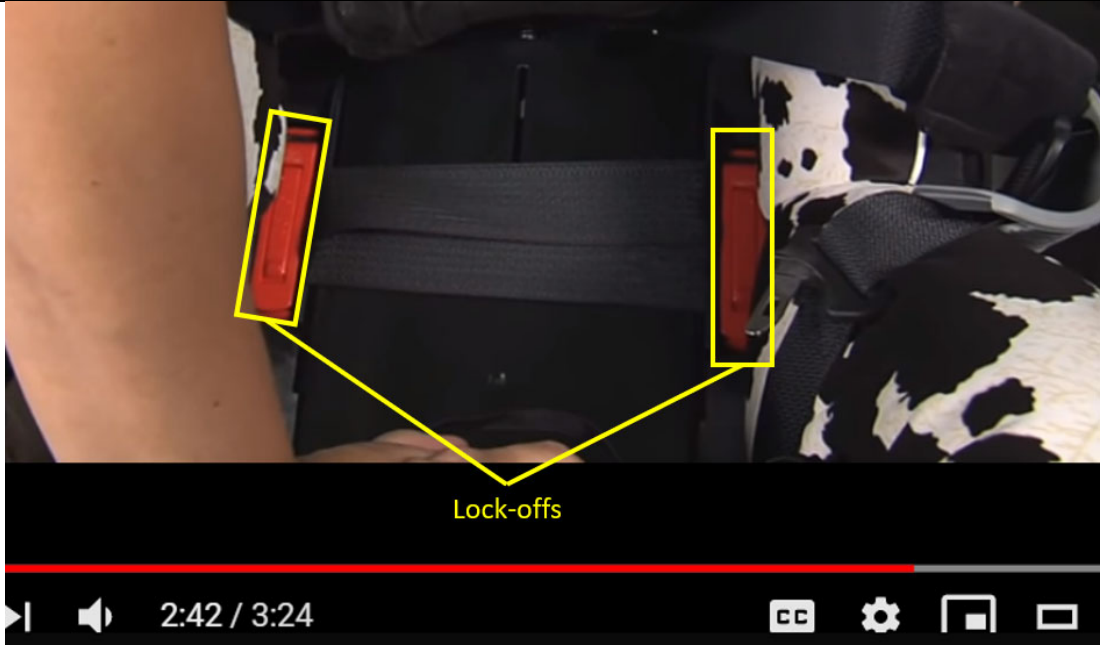
### Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
[1(c)(2)] wherein the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism is movable downwardly and forwardly to a first position substantially adjacent to the seat base and upwardly and rearwardly to a second position displaced therefrom. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

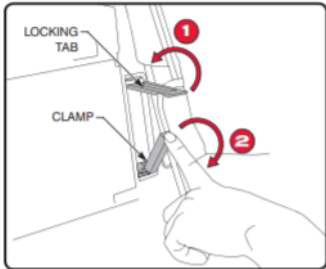
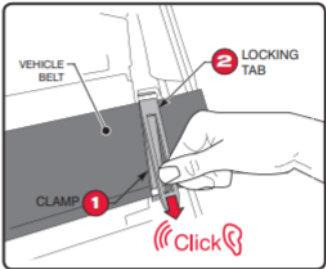

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
forward-facing orientation, and	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p><i>Id.</i>, p. 23.</p> 

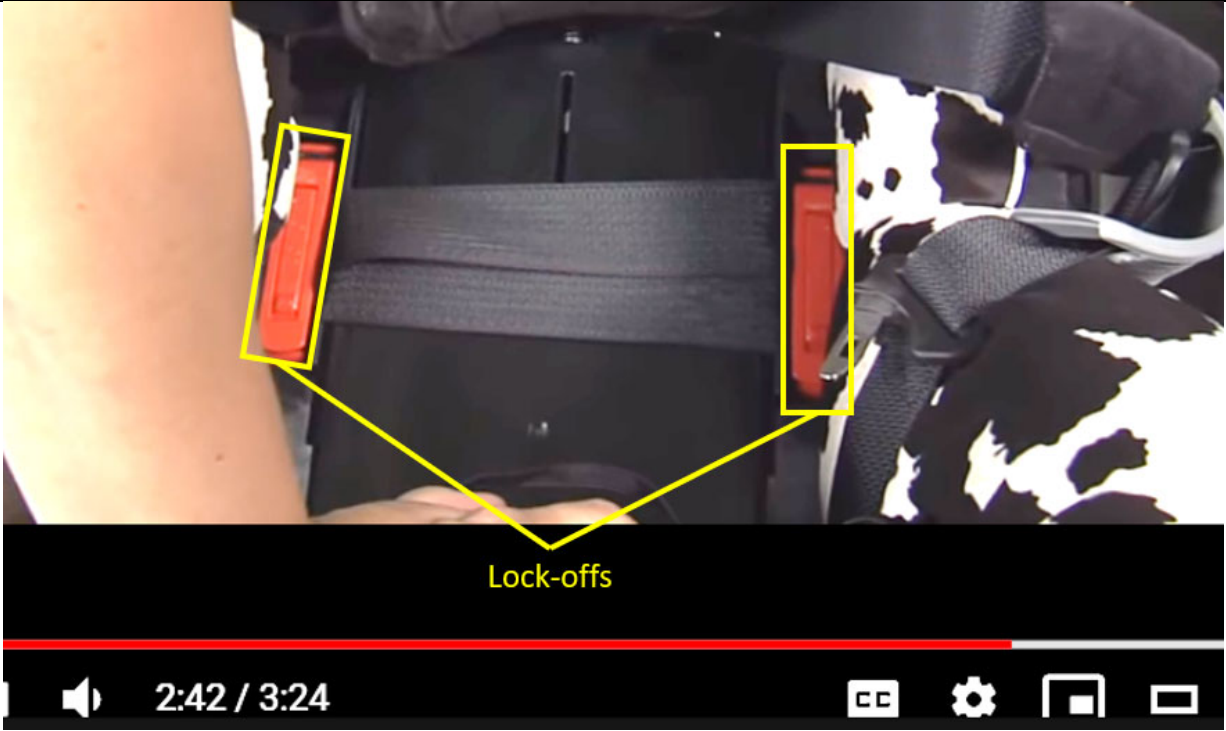
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 1.</i></p>
[1(d)] wherein in each of the forward or rear-facing orientations, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism	<p><i>Boulevard 70 CS discloses or renders obvious that in each of the forward or rear-facing orientations, the first and second lateral edge surfaces of respective different portions of the tensioning mechanism displace the belt to apply tension to the belt. Boulevard 70 CS User Guide, p. 14; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs; Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
displace the belt to apply tension to the belt.	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;">  </p> <p style="text-align: center;"><i>Boulevard 70 CS User Guide, p. 14.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

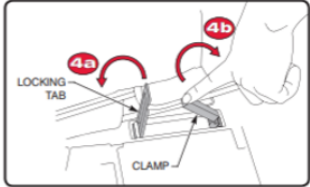




## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 1.</p>
2. The child seat according to claim 1,	<i>Boulevard 70 CS</i> discloses or renders obvious the first belt path extending transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base. <i>Boulevard 70 CS User Guide</i> ,



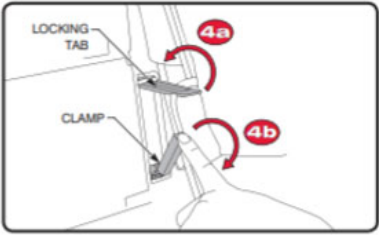
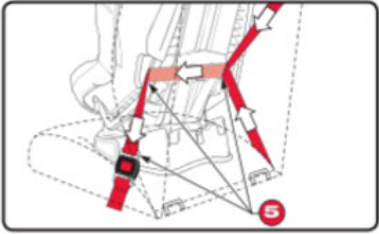

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.</p>	<p>p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide, p. 23.</i></p> </div> <div style="width: 35%;">    </div> </div>

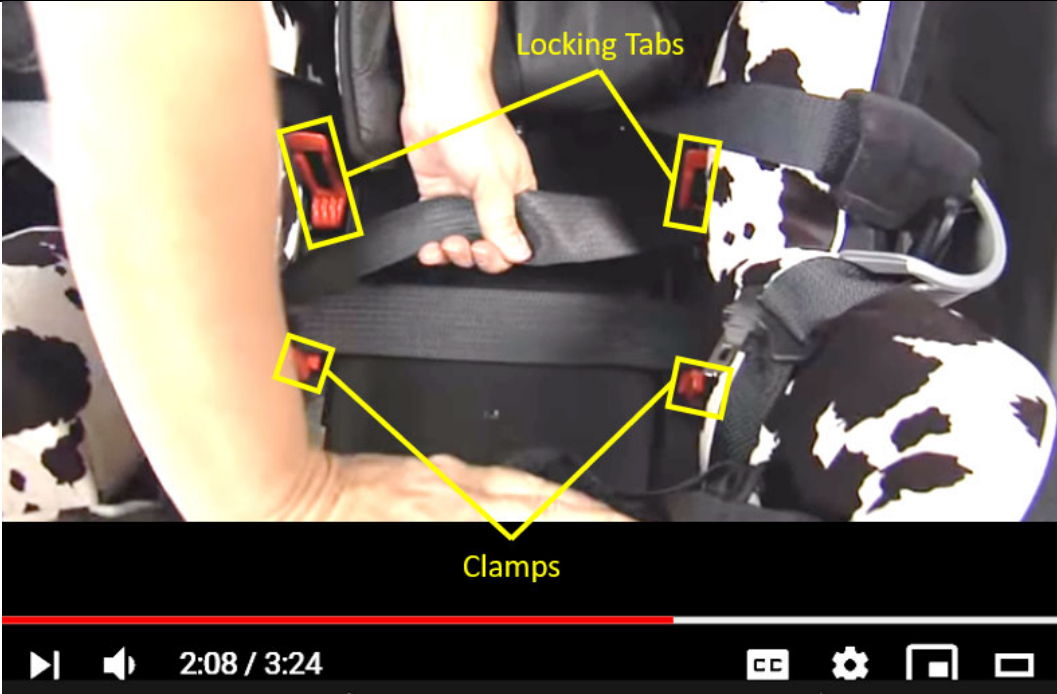
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 2.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
<p>3. The child seat according to claim 1, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the second belt path extending transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 29.</p>

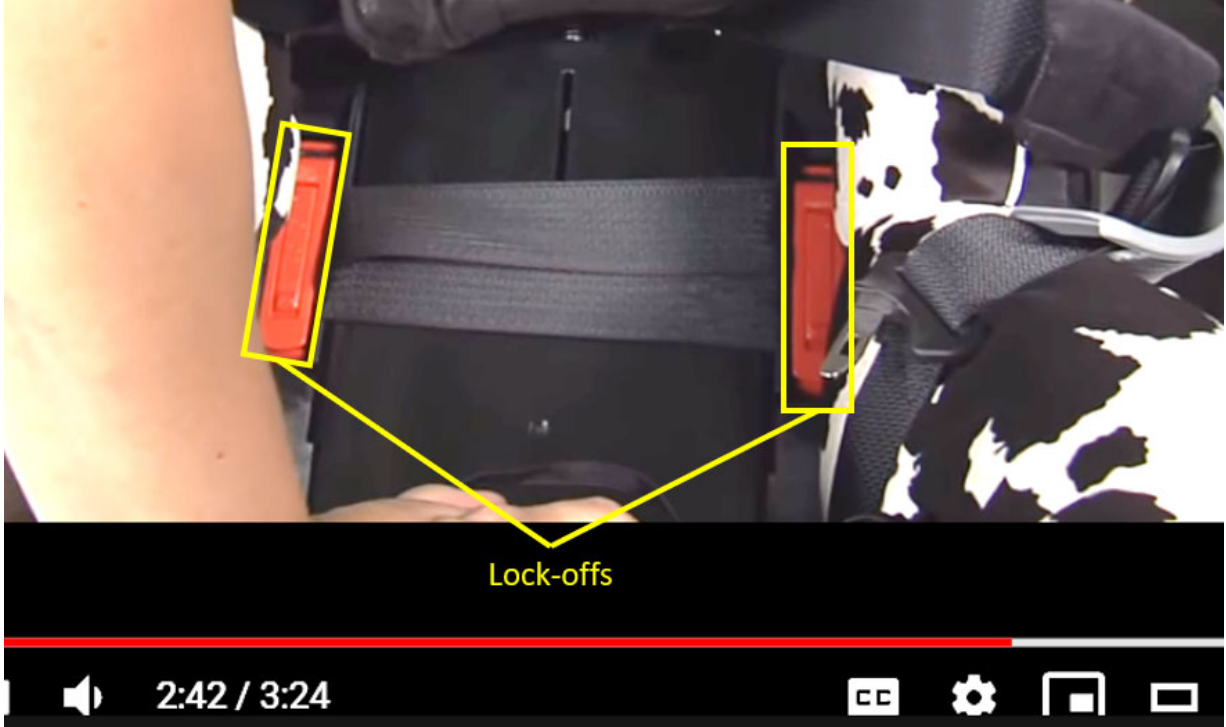
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 3.</p>
4. The child seat according to claim 1, wherein the tensioning mechanism is attached to the backrest portion so	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism is attached to the backrest portion so that the first and second edge surfaces are movable from the second position to the first position in response to receipt of a substantially vertical force. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>that the first and second edge surfaces are movable from the second position to the first position in response to receipt of a substantially vertical force.</p>	<div data-bbox="856 362 1270 1144"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1285 367 1661 597"> <p>Diagram 4a shows a hand pulling the locking tab upwards. Diagram 4b shows a hand pulling the clamp upwards. Labels 'LOCKING TAB' and 'CLAMP' are present.</p> </div> <div data-bbox="1285 613 1661 844"> <p>Diagram 5 shows a child in a car seat with a red vehicle belt being routed through the forward-facing belt slots. A red circle with the number 5 is in the bottom right corner.</p> </div> <div data-bbox="1285 860 1661 1091"> <p>Diagram 7 shows a hand pushing down into the middle of the child seating area while pulling the top (shoulder) part of the belt. A red circle with the number 7 is in the bottom right corner.</p> </div> <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div data-bbox="625 375 1843 1097">  </div> <p data-bbox="583 1101 1915 1170"><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p data-bbox="583 1211 1915 1357">Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

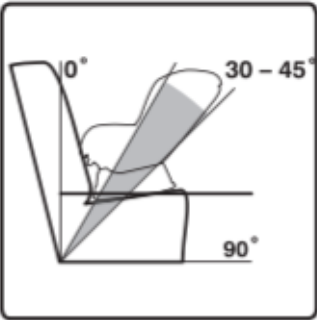

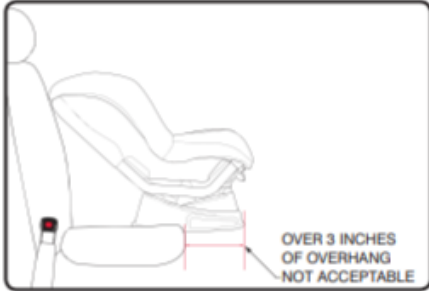

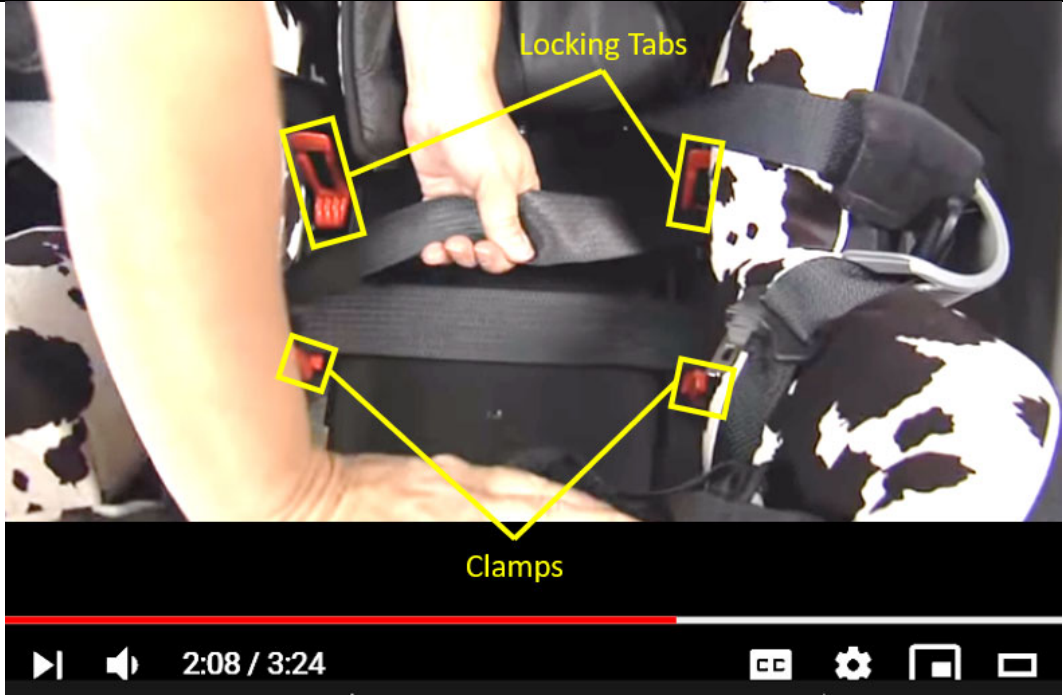
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 4.</p>
<p>[5(p)] A child seat configured to be secured to a vehicle seat in a rear-facing orientation in which an occupant of the child seat faces toward a backrest of the vehicle seat and a forward-facing orientation in which an occupant of the child seat faces away from the vehicle backrest, where the vehicle seat has a vehicle belt having a lap portion and a shoulder portion, the child seat comprising:</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious a child seat configured to be secured to a vehicle seat in a rear-facing orientation in which an occupant of the child seat faces toward a backrest of the vehicle seat and a forward-facing orientation in which an occupant of the child seat faces away from the vehicle backrest, where the vehicle seat has a vehicle belt having a lap portion and a shoulder portion. <i>Boulevard 70 CS User Guide</i>, p. 15; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 60%;"> <p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p> <p align="right"><i>Id.</i>, p. 15.</p> </div> <div style="width: 35%; text-align: center;">  </div> </div>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 10px;">  </div> <p style="text-align: right; margin-top: 10px;"><i>Id.</i>, p. 15.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div data-bbox="760 337 1816 1027">A video frame showing a person's hands installing a car seat. The car seat is black with white cow print patterns. A black seat belt is being threaded through the seat. Four yellow boxes with lines pointing to them are labeled 'Locking Tabs' (top left and top right) and 'Clamps' (bottom left and bottom right). The video player interface at the bottom shows a red progress bar, play/pause, volume, and time 2:08 / 3:24.</div> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(a)(1)] a seat base comprising a seat portion, a backrest portion, and	<p>See claim element [1(a)(1)].</p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(a)(2)] first and second lateral edges that protrude	<p>See claim element [1(a)(2)].</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
forwardly and upwardly from the seat and backrest portions;	<i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(b)(1)] a first belt path generally at a middle of the seat portion in a forward and rearward direction, and	See claim element [1(a)(3)].  <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(b)(2)] a second belt path generally at an intersection of the seat and backrest portions; and	See claim element [1(a)(4)].  <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(c)(1)] a tensioning mechanism attached to the seat base to be movable between a first position and a second position,	See claim element [1(b)(1)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.
[5(c)(2)] the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is rotatable between the first position and the second position pivotally about the axis, and	See claim element [1(b)(2)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 5.

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

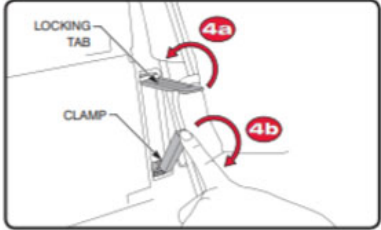
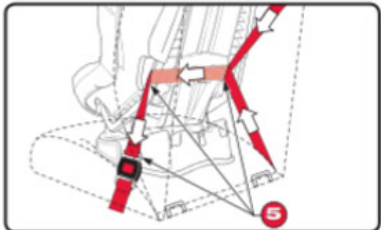

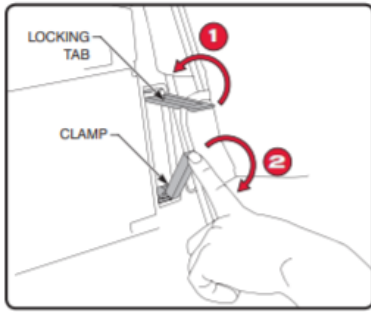
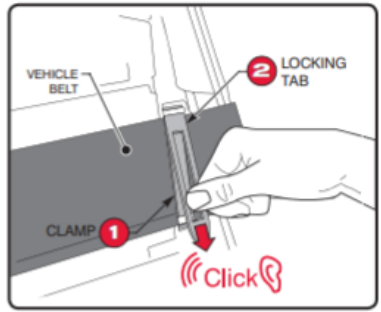
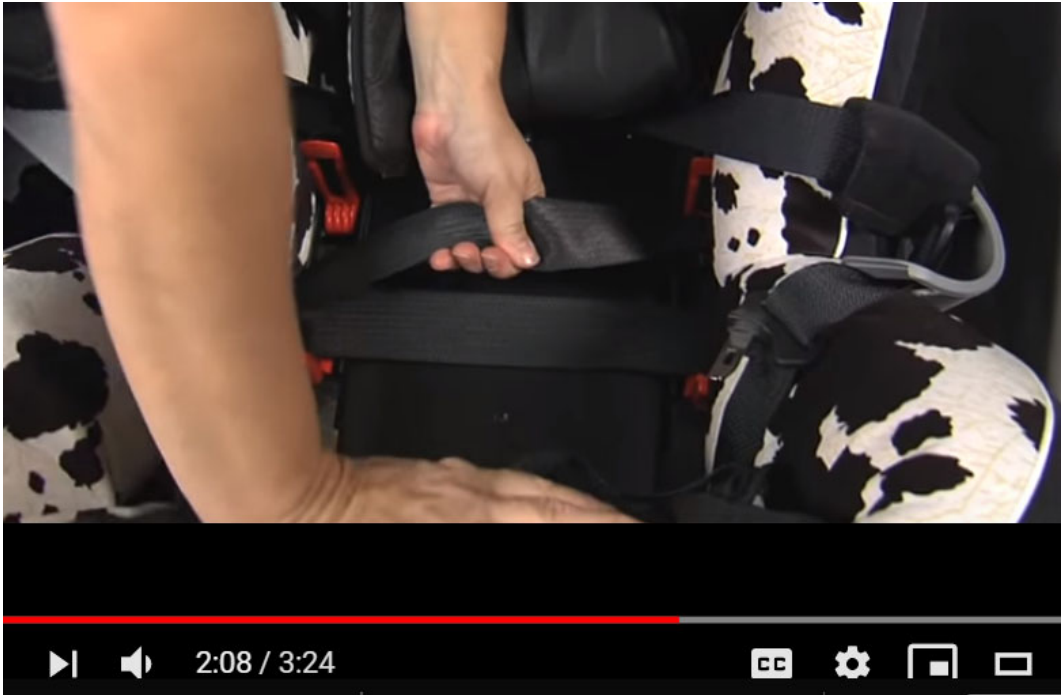
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
[5(c)(3)] wherein the tensioning mechanism has a first rigid edge surface and a second rigid edge surface,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism has a first rigid edge surface and a second rigid edge surface. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div> <p align="right"><i>Id.</i>, p. 29.</p>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

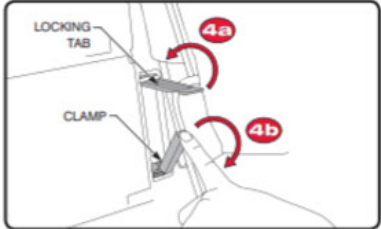
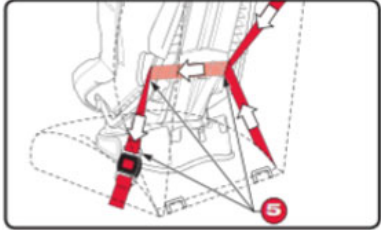

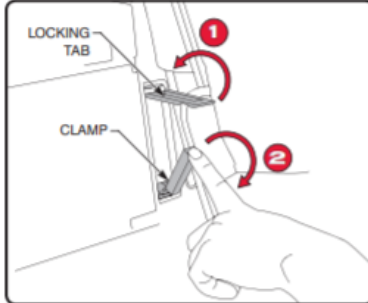
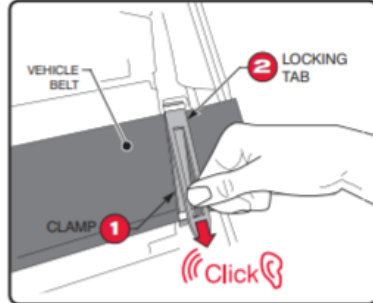
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 5.</p>
<p>[5(c)(4)] the first and second ridge edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first and second ridge edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div>



Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><i>Id.</i>, p. 29.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


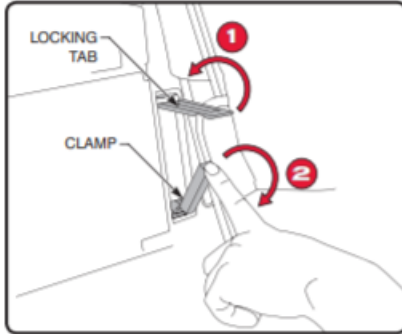
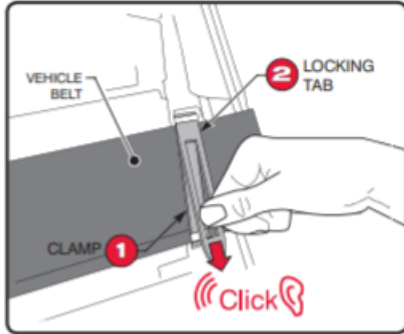
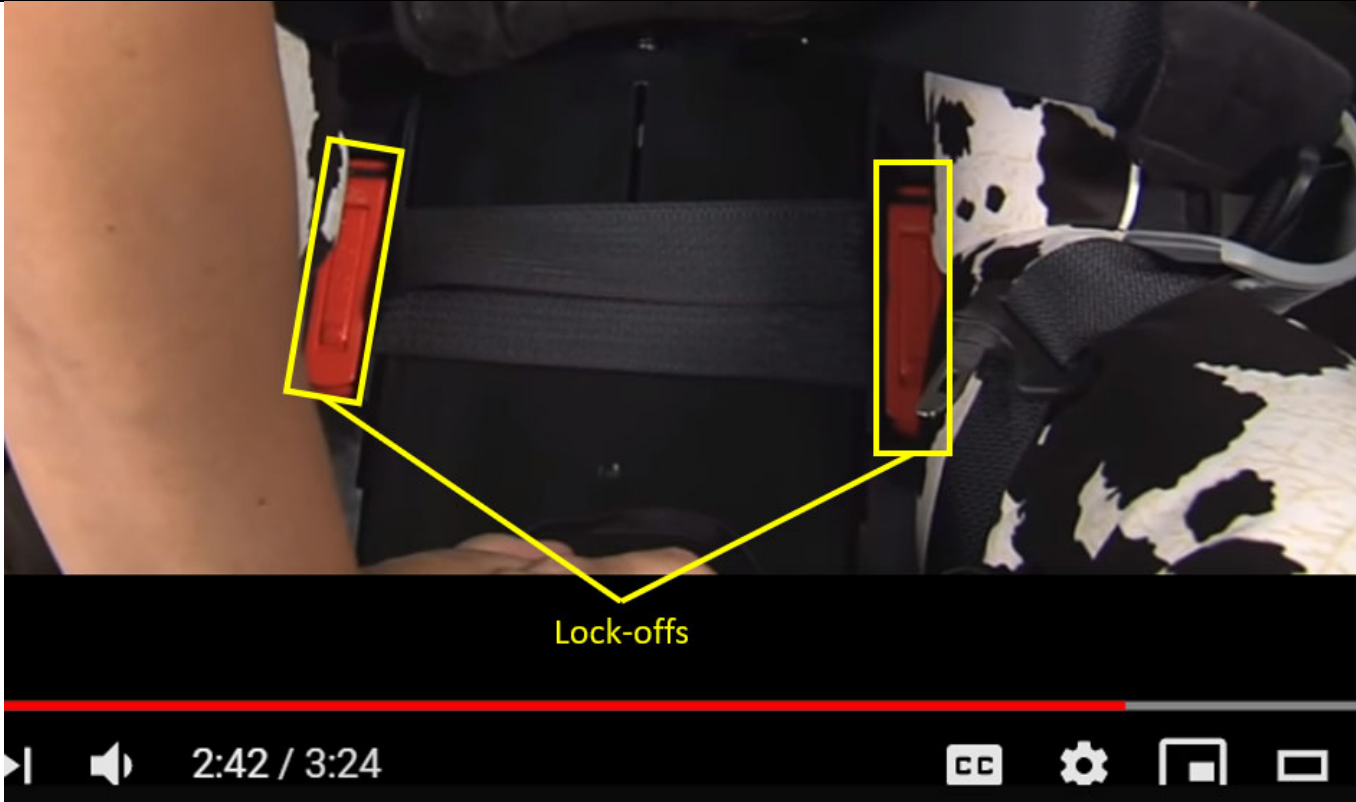
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(d)(1)] wherein in the first position, the first and second rigid edge surfaces are substantially adjacent to the seat base, and	<p><i>Boulevard 70 CS discloses or renders obvious that in the first position, the first and second rigid edge surfaces are substantially adjacent to the seat base. Boulevard 70 CS User Guide, p. 14; Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

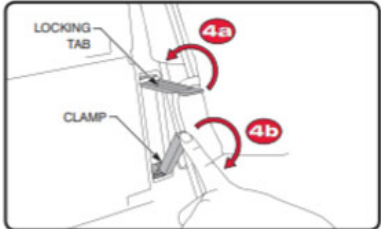
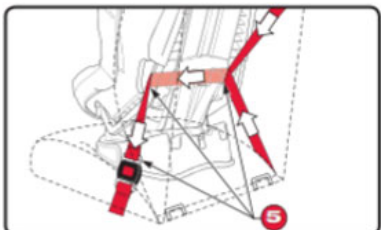

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="center"><b>Lock-offs</b></p> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(d)(2)] wherein in the second position, the first	<i>Boulevard 70 CS discloses or renders obvious that in the second position, the first and second rigid edge surfaces are at least partly displaced from the seat base so that the lap section of the vehicle belt and the</i>

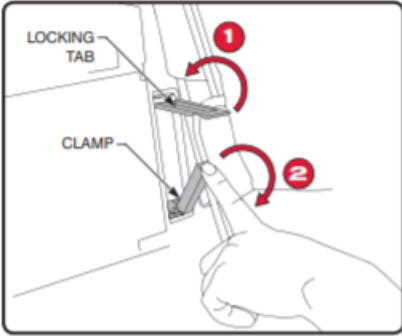
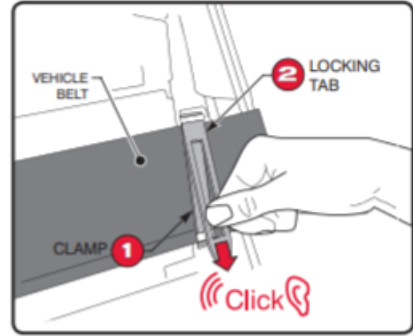
# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
and second rigid edge surfaces are at least partly displaced from the seat base so that the lap section of the vehicle belt and the shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat,	<p>shoulder section of the vehicle belt are received by the backrest portion from a gap between the first and second rigid edge surfaces and the backrest portion so that application of tension to the vehicle belt retains the child seat in the forward-facing orientation with respect to the vehicle seat. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div> <p style="text-align: right;"><i>Id.</i>, p. 29.</p>

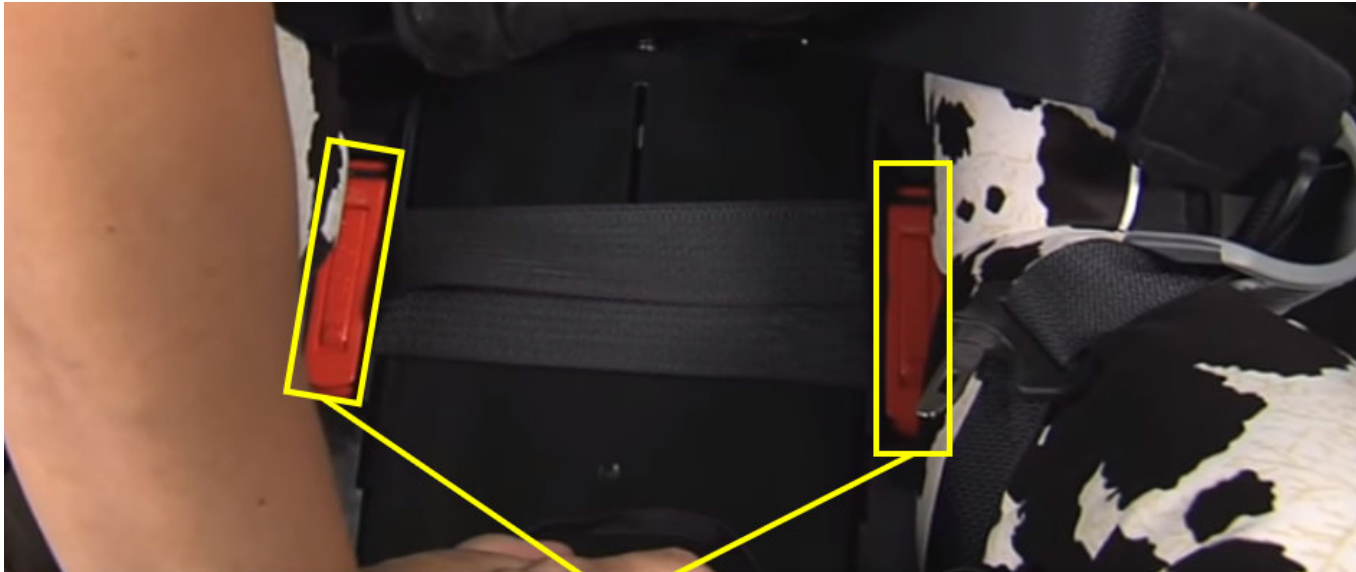
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>
[5(e)] wherein movement of the first and second rigid edge surfaces from the second position to the	<p><i>Boulevard 70 CS discloses or renders obvious movement of the first and second rigid edge surfaces from the second position to the first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

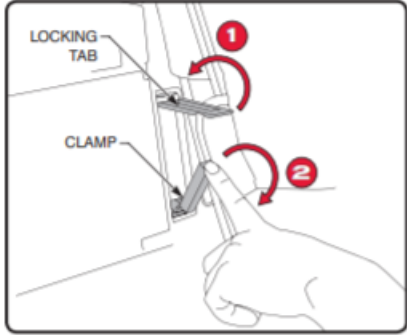
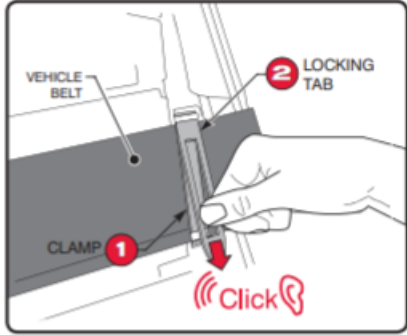
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>first position causes the first and second rigid edge surfaces to displace a portion of the shoulder section and a portion of the lap section of the vehicle belt with respect to a surface of the backrest portion to thereby increase the tension in the vehicle belt that retains the child seat in the forward-facing orientation,</p>	<p>in the forward-facing orientation. <i>oulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="787 483 1659 1279"> <p align="center"><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> <p align="center"><b>14</b></p> </div> <p align="right"><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div><p>Lock-offs</p><p>2:42 / 3:24</p><p>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</p><p>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</p></div>

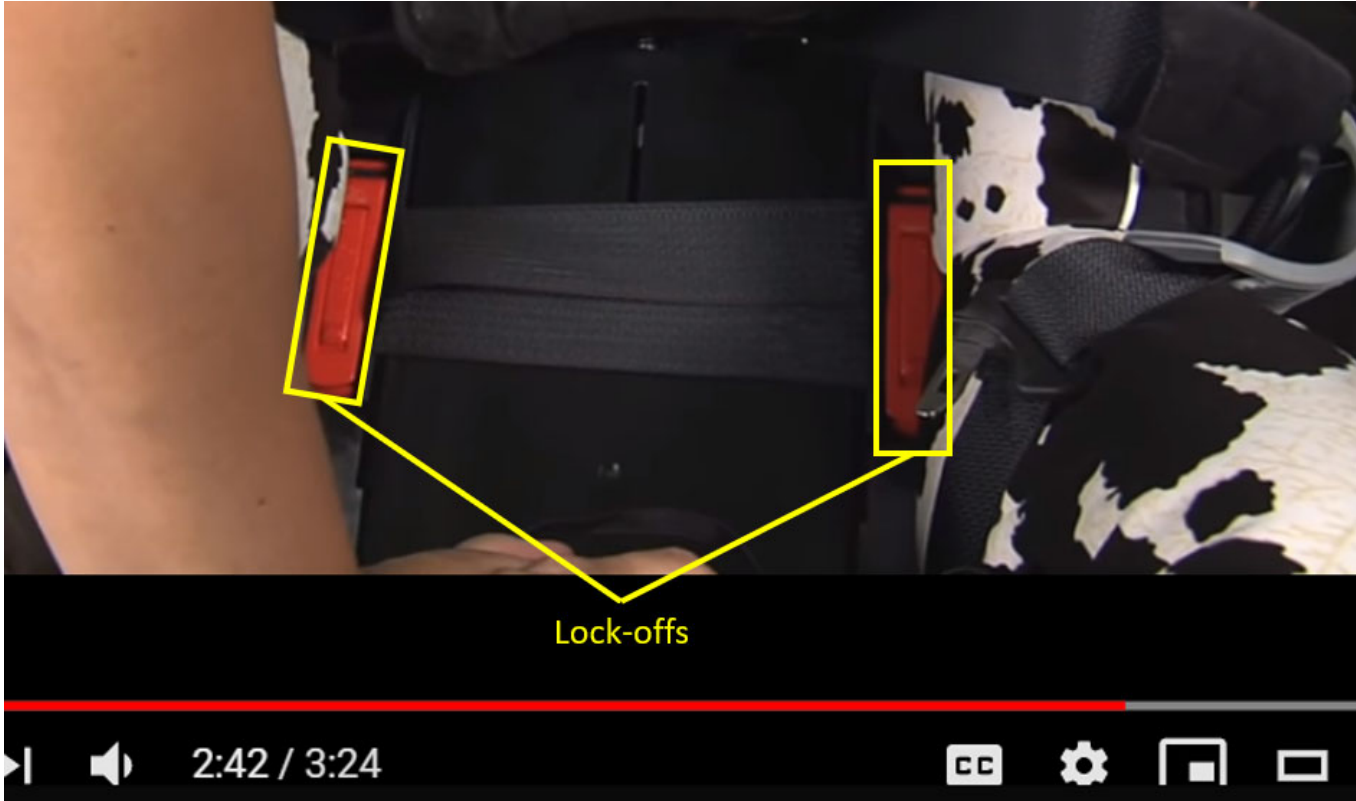


# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
<p>[5(f)] wherein, in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path, and</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the forward-facing orientation, the first and second rigid edge surfaces of a first portion of the tensioning mechanism displace the belt to apply tension to the belt in the second belt path. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p>



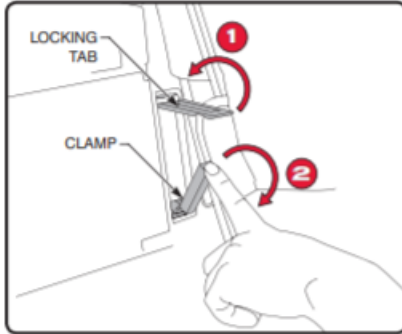
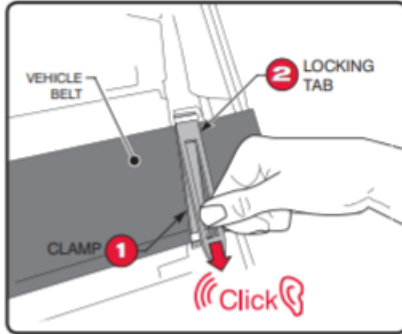
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><i>Id.</i>, p. 14.</p>  <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with</p>

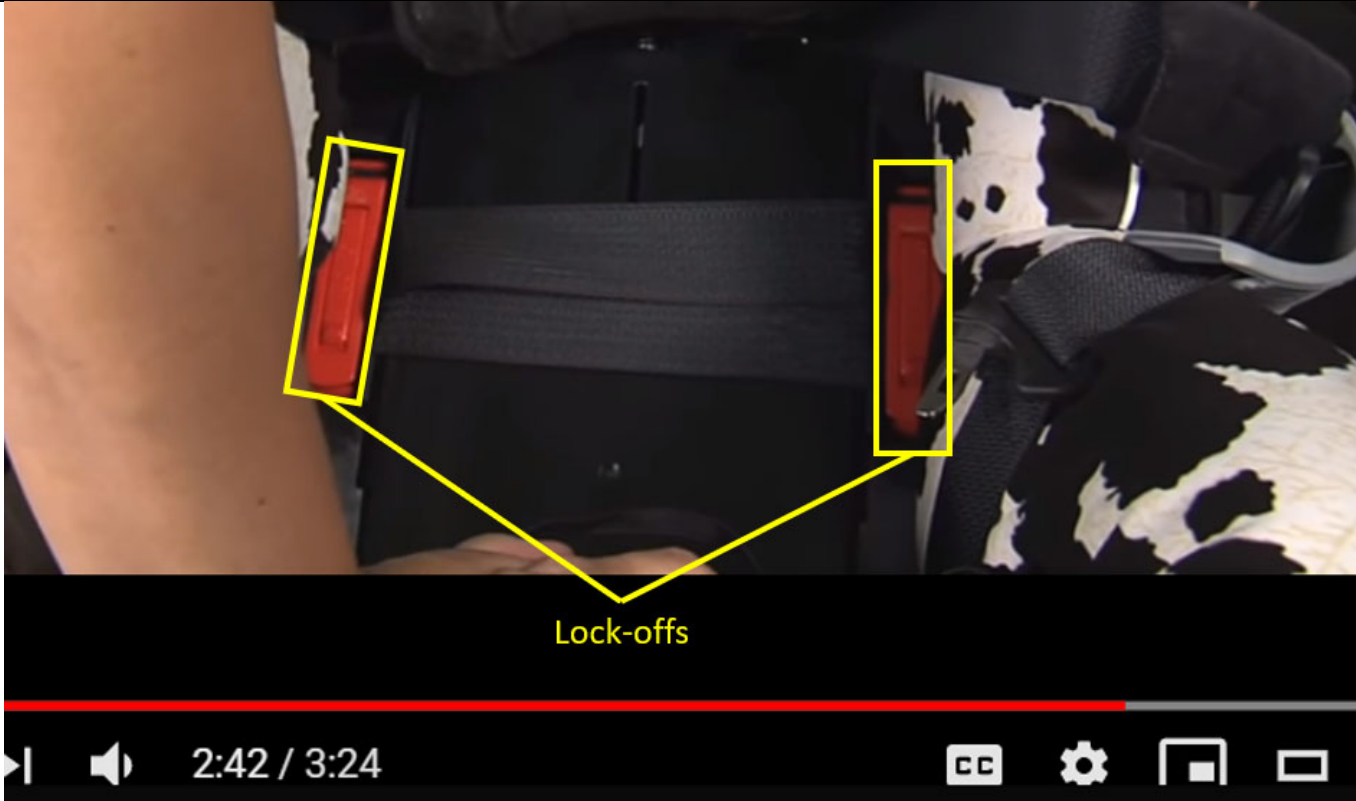
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat's</i> tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 5.</p>
[5(g)] wherein, in the rear-facing orientation, the first and second rigid edge surfaces of a second portion of the tensioning mechanism displace the belt to apply tension to the belt.	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the rear-facing orientation, the first and second rigid edge surfaces of a second portion of the tensioning mechanism displace the belt to apply tension to the belt. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

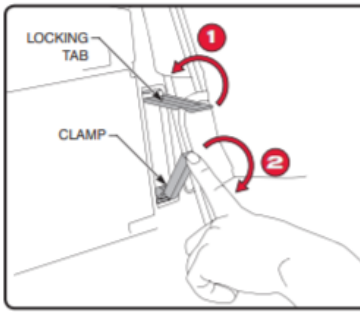
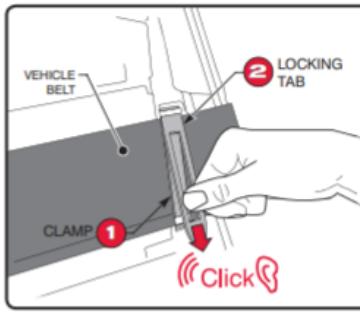
Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p><i>Boulevard 70 CS, alone or in combination with Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat, thus discloses or renders obvious this limitation of claim 5.</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

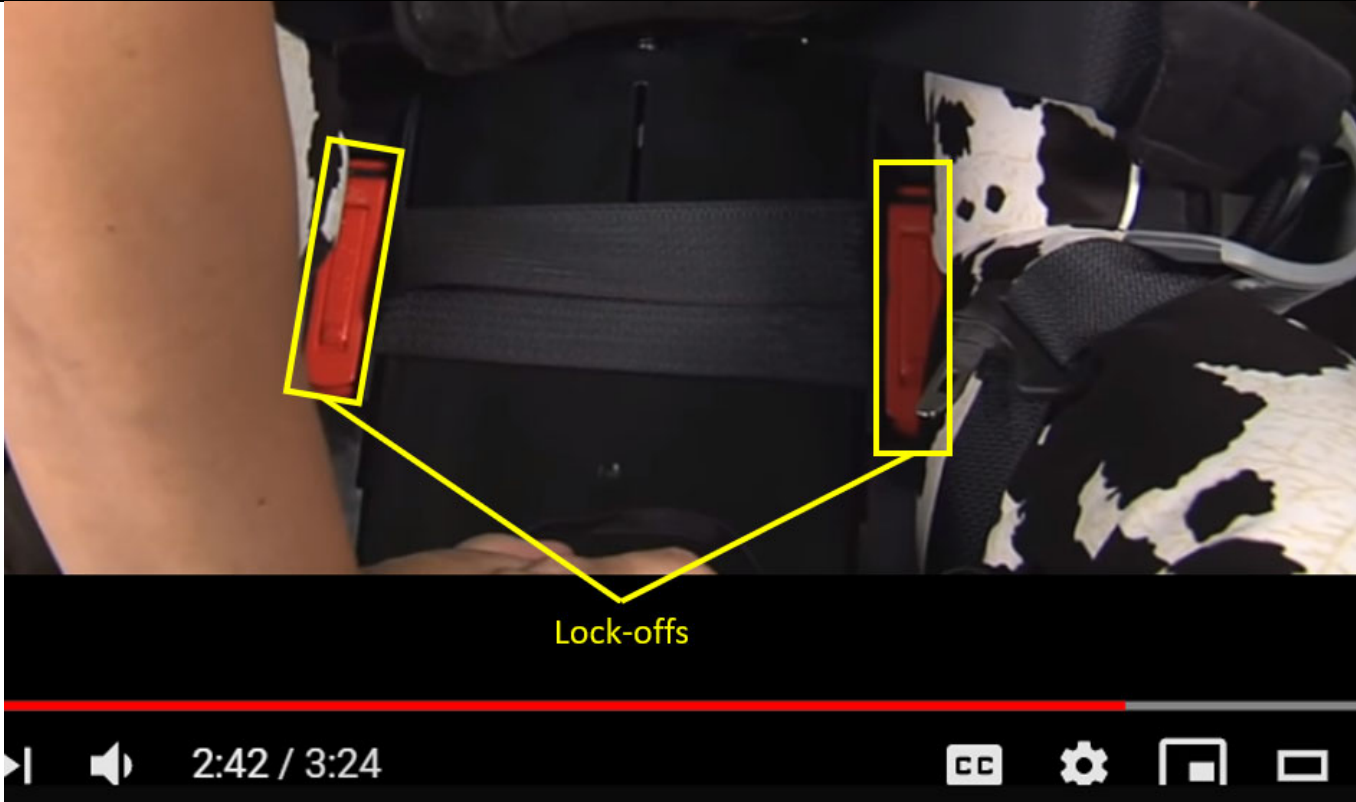
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
<p>6. The child seat according the claim 5, wherein the first belt path is configured to allow a user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation, wherein the second belt path is configured to allow the user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.</p>	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path being configured to allow a user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation, and the second belt path being configured to allow the user to position the lap section and the shoulder section of the vehicle belt to be displaced by the first and second rigid edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div data-bbox="840 682 1638 1315"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div data-bbox="840 828 1218 1234"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div data-bbox="1260 828 1638 1315"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <div data-bbox="819 1356 934 1412"> <p>14</p> </div>

*Id.*, p. 14.

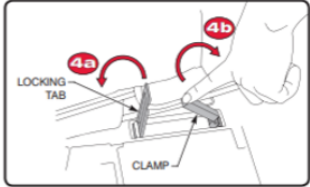


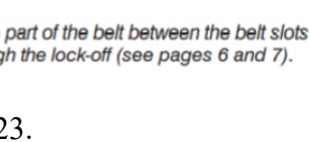
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>Lock-offs</p> <p>2:42 / 3:24</p> <p>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</p>


# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>    


*Id.*, p. 23.



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

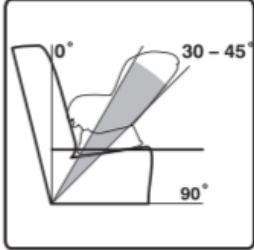

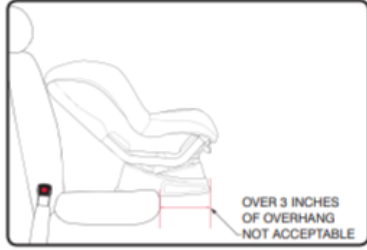

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 6.</p>
7. The child seat according to claim 6,	See claim 2.

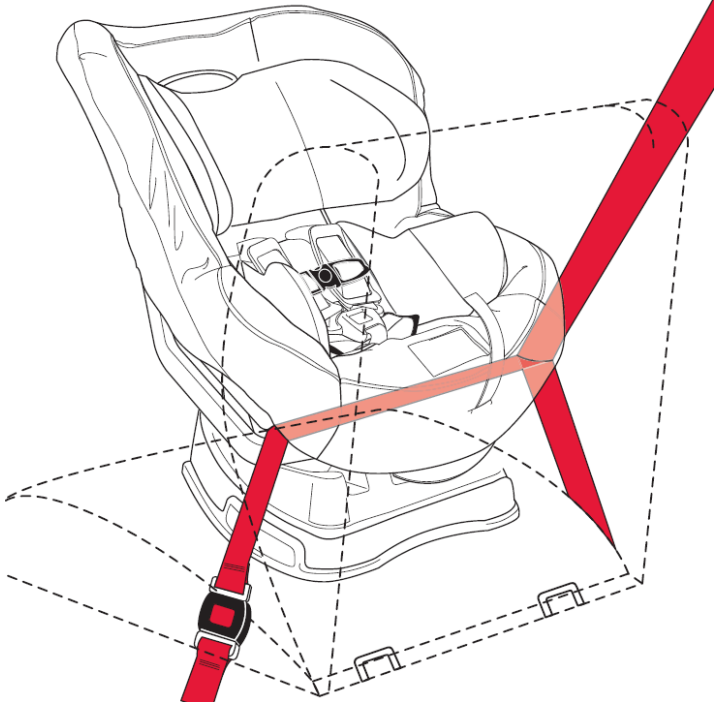
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.	The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 7.
8. The child seat according to claim 6, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.	See claim 3.  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 8.
[9(p)] A child seat configured to be secured to a vehicle seat in both a rear-facing and a forward-facing orientation with a vehicle belt, the child seat comprising:	<i>Boulevard 70 CS</i> discloses or renders obvious that in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt. <i>Boulevard 70 CS User Guide</i> , p. 15.

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Rear-Facing</b></p> <p>When installed in the rear-facing position, the child seat should be reclined at least 30° from vertical for children and up to 45° from vertical for infants unable to maintain head and neck control (not to exceed 45°) when the car is parked on a level surface. When installing the seat in rear-facing mode, recline the seat to position 3 and use the guide line on the child seat to help achieve an acceptable recline angle for rear-facing installations.</p>  <p align="center"><i>Id.</i>, p. 15.</p> <p><b>Forward-Facing</b></p> <p><b>IMPORTANT:</b> In forward-facing installations, it is important that the base of the child seat rests completely flat on the vehicle seat. As illustrated below, it is permissible to allow up to 20% or 3 in. (7.6 cm) of the base to hang over the edge of the vehicle seat. Some vehicle seats do not allow enough of the child seat base to contact the vehicle seat. If this is the case, adjust the recline angle to a more upright position. Not doing so could cause the child seat not to perform as intended.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  <p><i>Acceptable overhang</i></p> </div> <div style="text-align: center;">  <p><i>Unacceptable overhang</i></p> </div> </div> <div style="text-align: right; margin-top: 10px;">  </div> <p align="center"><i>Id.</i>, p. 15.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
[9(a)(1)] a seat base comprising a seat portion, a backrest portion, and	<p>See claim element [1(a)(1)].</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(a)(2)] opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion;	<p><i>Boulevard 70 CS</i> discloses or renders obvious opposing side portions that protrude forwardly from the backrest portion and upwardly from the seat portion. <i>Boulevard 70 CS User Guide</i>, p. 22.</p>  <p align="center"><i>Id.</i>, p. 22.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(b)(1)] a first belt path generally at a middle of the seat portion in a forward and rearward direction, and	See claim element [1(a)(3)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(b)(2)] a second belt path generally at an intersection of the seat and backrest portions; and	See claim element [1(a)(4)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 9.
[9(c)(1)] a tensioning mechanism attached to the seat base to be movable between a first position and a second position and comprising an engaging surface,	<i>Boulevard 70 CS</i> discloses or renders obvious a tensioning mechanism attached to the seat base to be movable between a first position and a second position and comprising an engaging surface. <i>Boulevard 70 CS User Guide</i> , p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

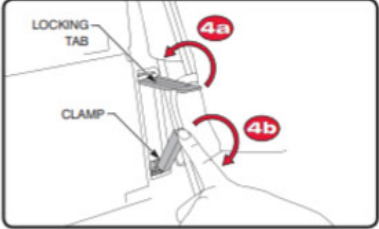
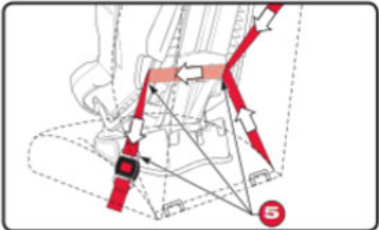

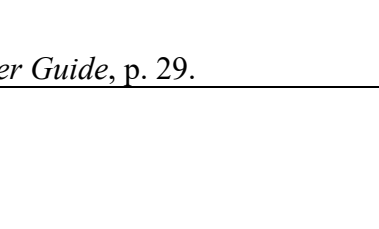

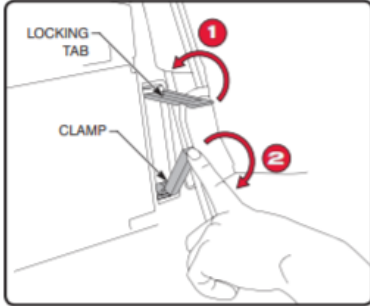
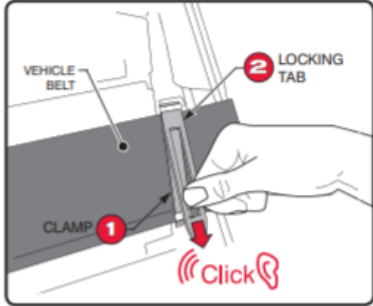

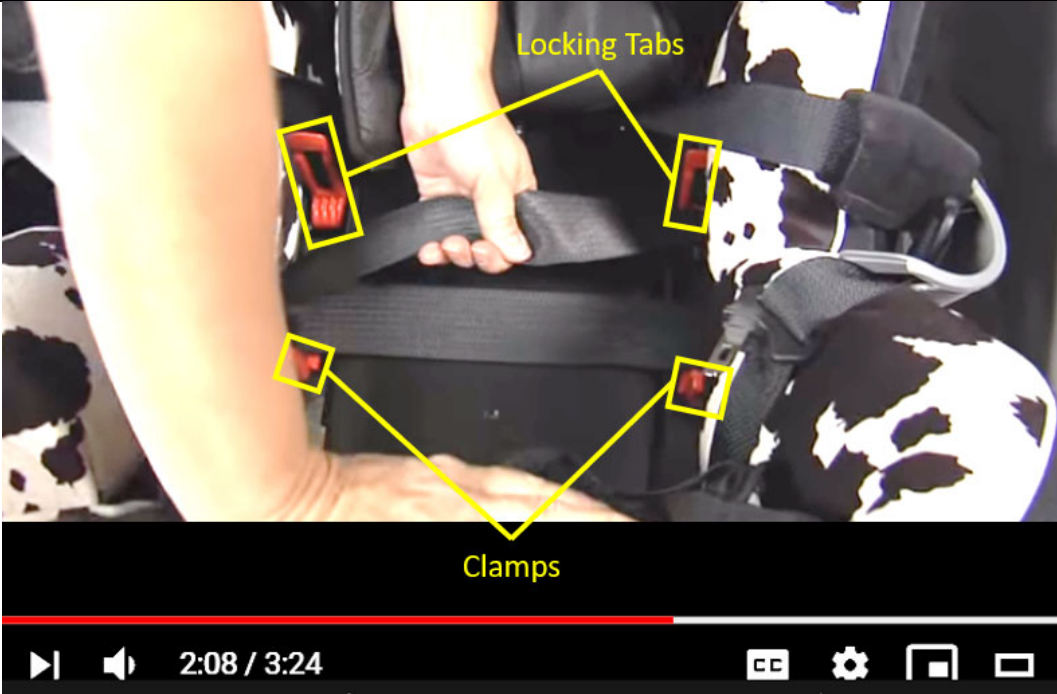
Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p>      <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p></p> <p><i>Id.</i>, p. 14.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div data-bbox="722 337 1772 1026">A video frame showing a person's hands installing a car seat. The car seat is black with white cow print patterns. A black seat belt is being buckled into the car seat. Four yellow boxes with lines pointing to them are labeled 'Locking Tabs' (top two) and 'Clamps' (bottom two). The video player interface at the bottom shows a red progress bar, a play button, a volume icon, the time '2:08 / 3:24', and icons for closed captions, settings, and full screen.</div> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

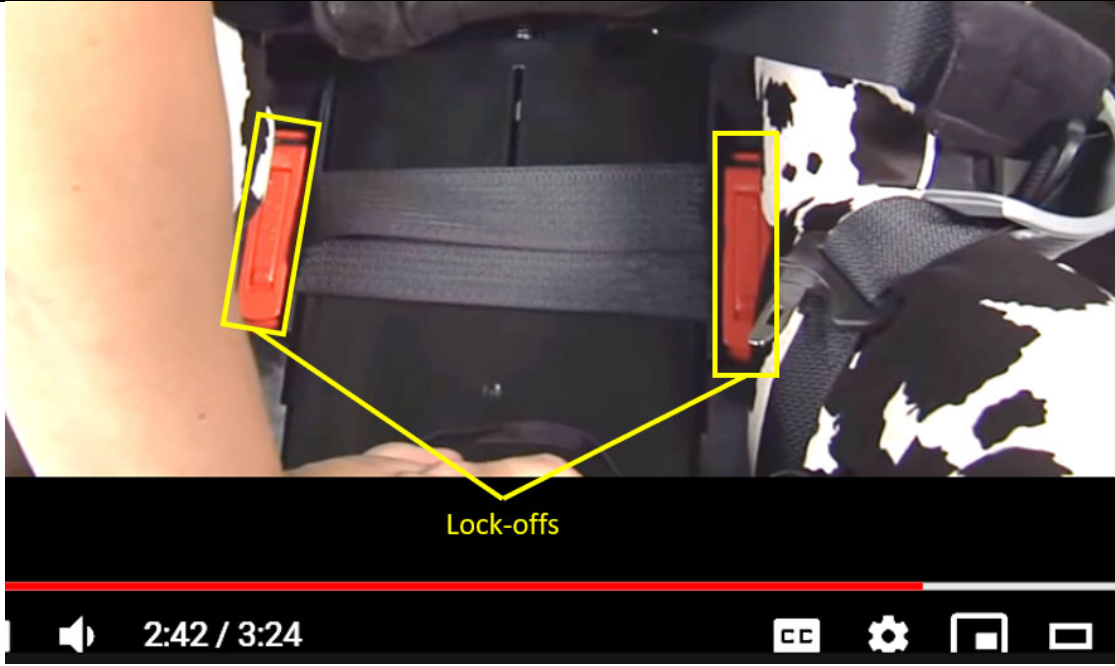
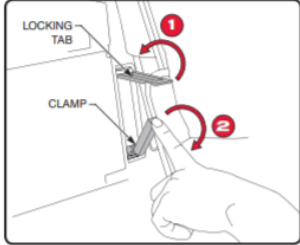
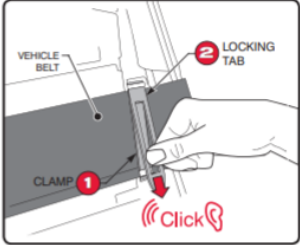
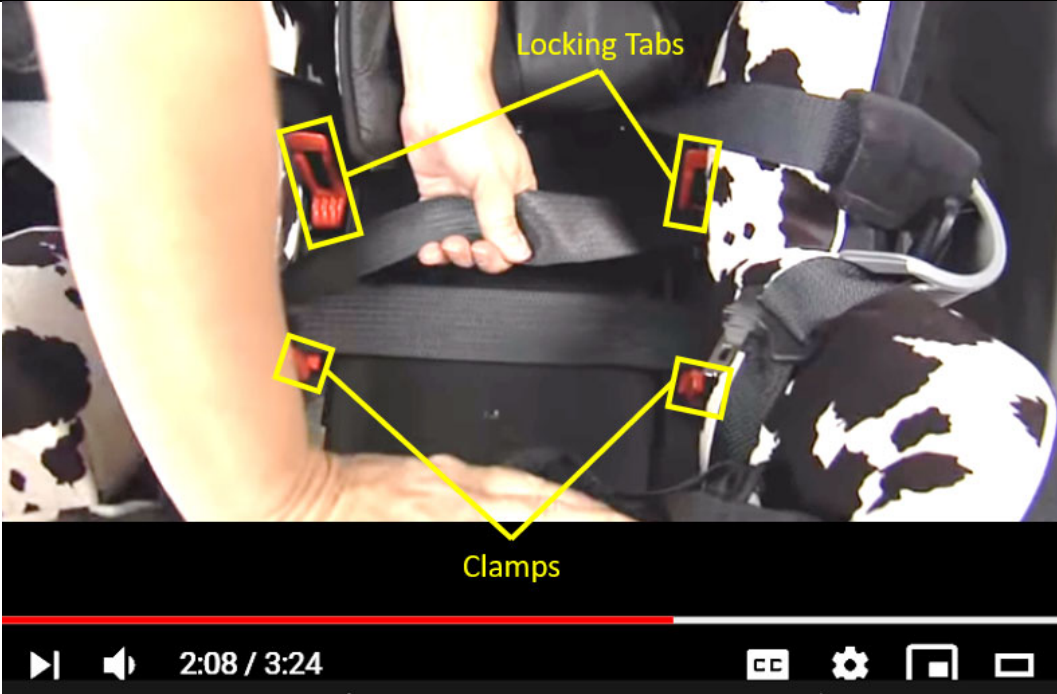
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="right"><i>Britax</i></p> <p align="center"><i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(c)(2)] the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is configured to rotate	<p><i>Boulevard 70 CS</i> discloses or renders obvious the tensioning mechanism having an end attached to the backrest portion at an axis such that the tensioning mechanism is configured to rotate downwardly to the first position from the second position about an axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

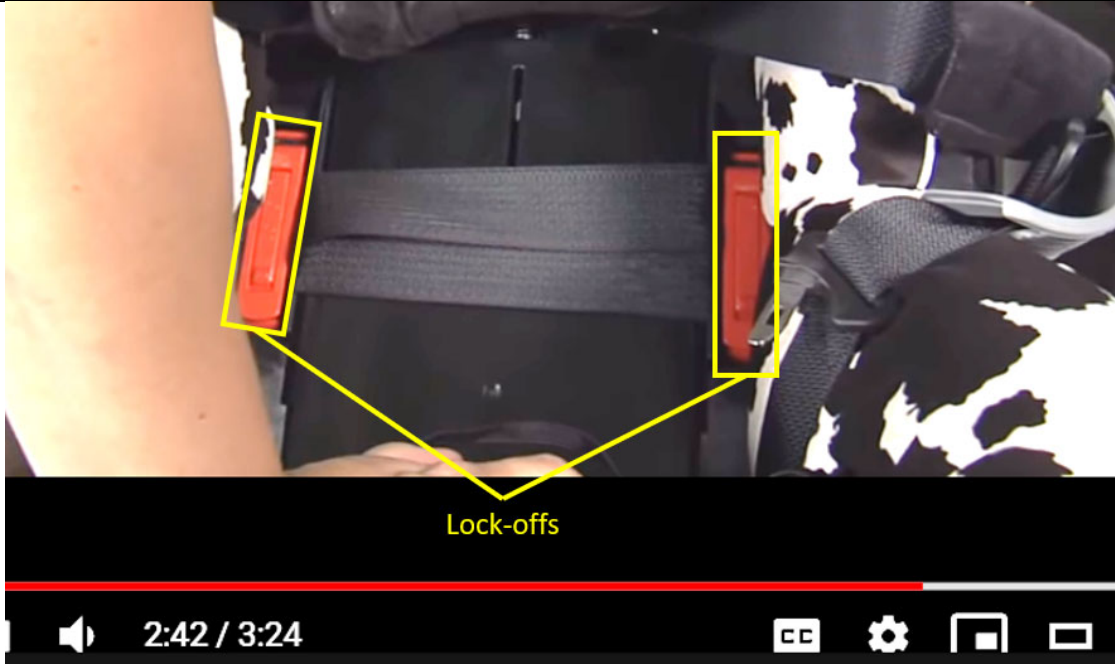
Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
downwardly to the first position from the second position about an axis, and	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

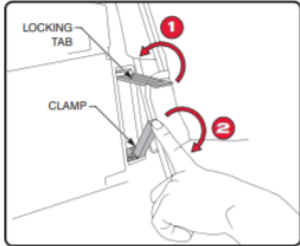
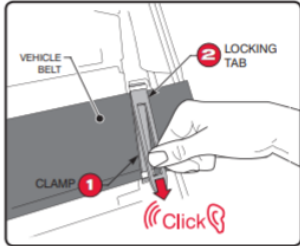

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div data-bbox="722 337 1772 1026">A video frame showing a person's hands installing a car seat. The car seat is black with white cow print patterns. A black seat belt is being buckled into the car seat. Four yellow boxes with lines pointing to them are labeled 'Locking Tabs' and 'Clamps'. The video player interface at the bottom shows a red progress bar, a play button, a volume icon, and the time '2:08 / 3:24'. There are also icons for closed captions, settings, and a full screen button.</div> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

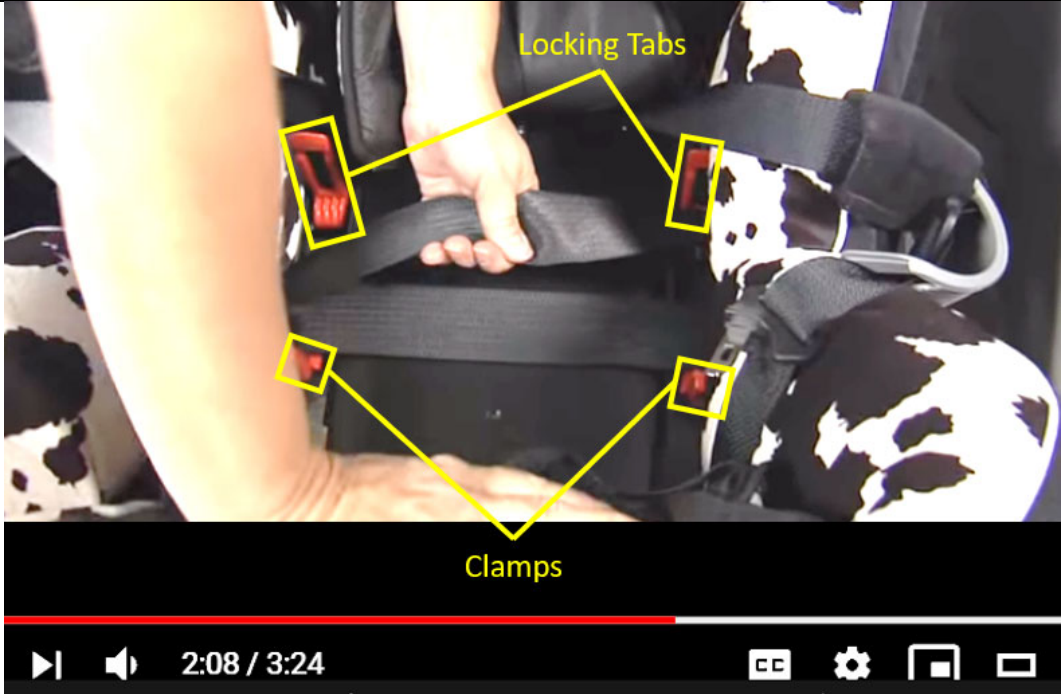
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="right"><i>Britax</i></p> <p align="center"><i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(c)(3)] wherein the tensioning mechanism has a first lateral edge surface and a second lateral edge surface,	<p>See claim element [(1)(b)(3)].</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>

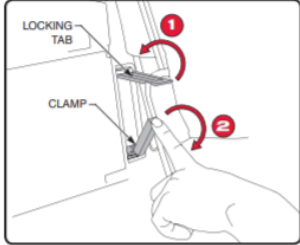
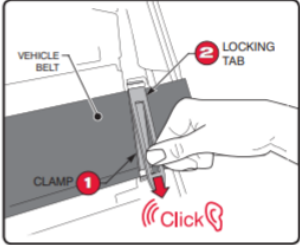
## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
[9(c)(4)] the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first and second lateral edge surfaces extending along respective sides of the tensioning mechanism from and transverse to the axis. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p style="text-align: center;"><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"> 14</p> <p style="text-align: center;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

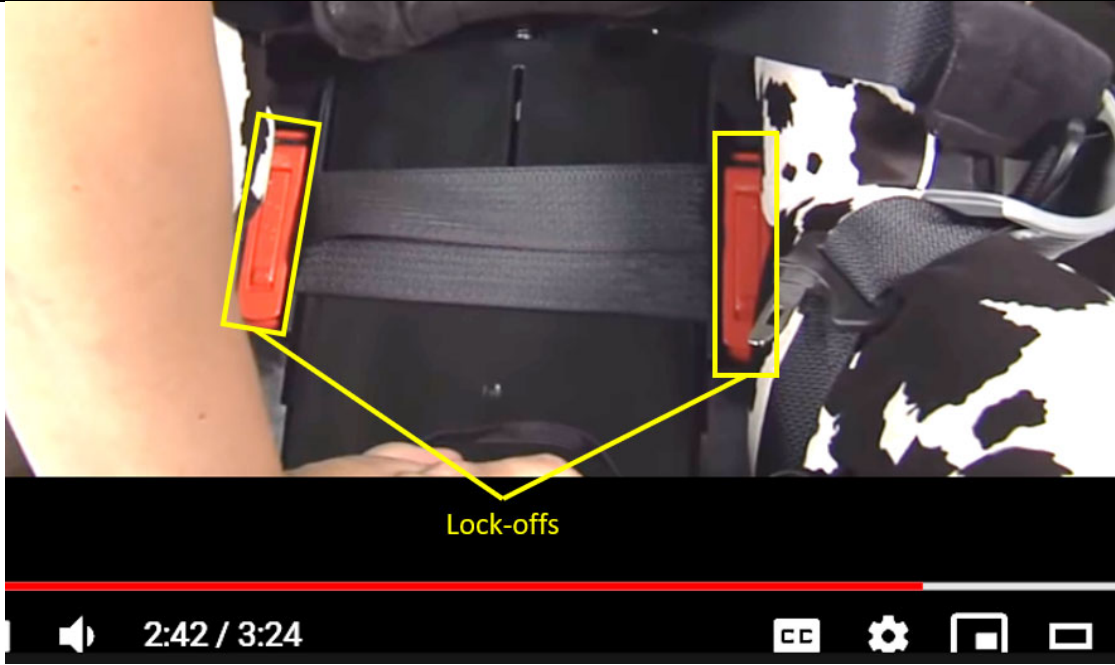
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(d)] wherein in the first position, the first and second lateral edge surfaces are substantially	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the first and second lateral edge surfaces are substantially adjacent to the seat base. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

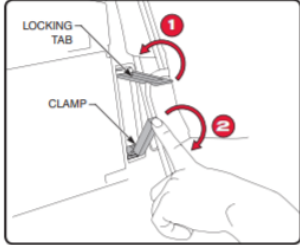
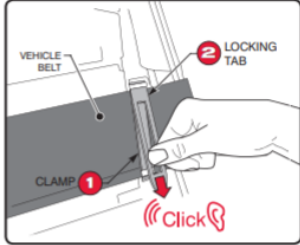

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
adjacent to the seat base, and	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"><b>14</b></p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide, p. 14.</i></p>



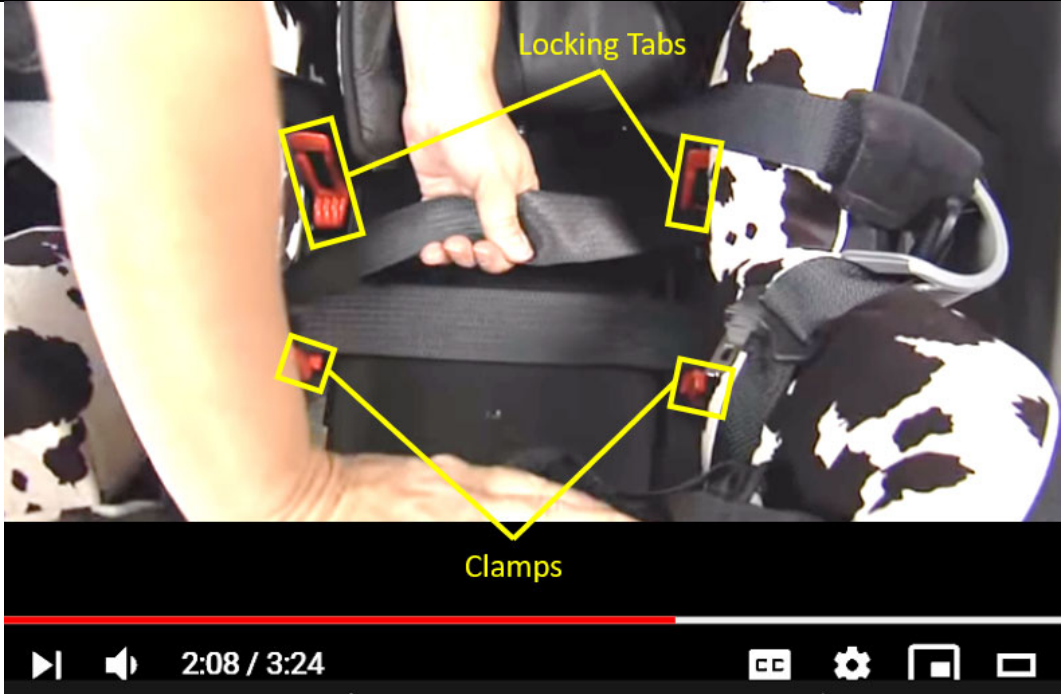
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="right"><i>Britax</i></p> <p align="center"><i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(e)] wherein in the second position, the first and second lateral edge surfaces are at least partly displaced from the seat	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the second position, the first and second lateral edge surfaces are at least partly displaced from the seat base in order to receive the vehicle belt.</p>

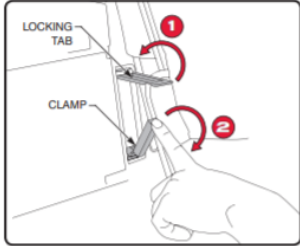
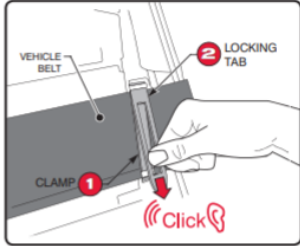

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
base in order to receive the vehicle belt,	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;">    <i>Boulevard 70 CS User Guide, p. 14.</i> </p>

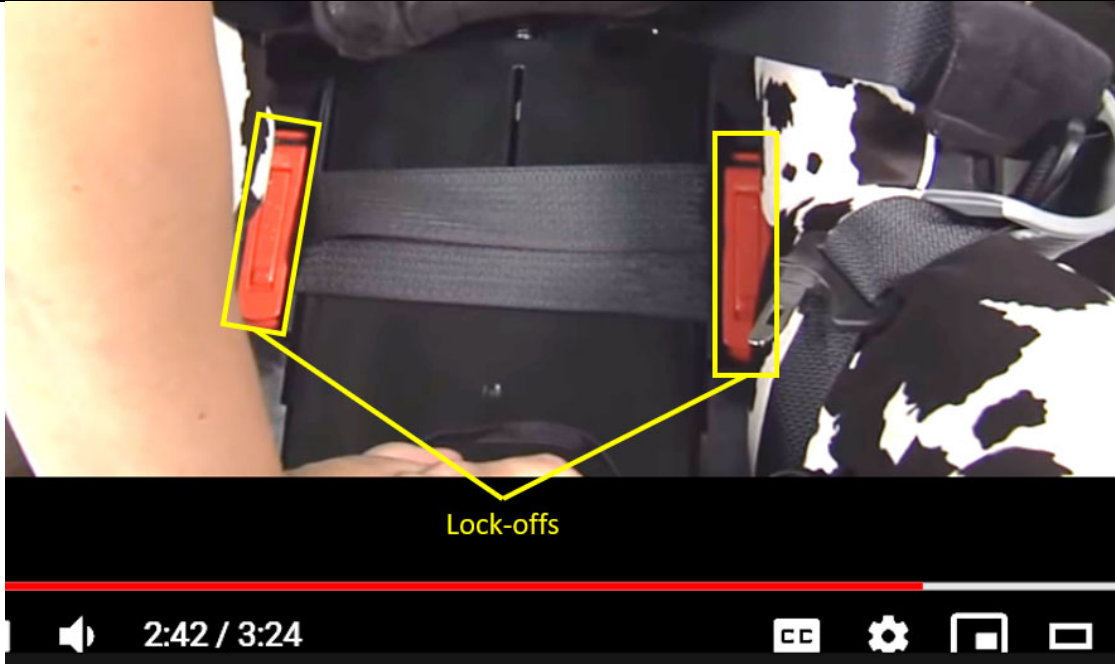
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[9(f)] wherein movement of the first and second lateral edge surfaces from the second position to the first position causes the	<p><i>Boulevard 70 CS</i> discloses or renders obvious movement of the first and second lateral edge surfaces from the second position to the first position causes the engaging surface, which is disposed between the first and second lateral edge surfaces, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the vehicle belt to secure the child</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>engaging surface, which is disposed between the first and second lateral edge surfaces, to press a first portion of the vehicle belt against the opposing side portions and deflect a second portion of the vehicle belt to be closer to the vehicle belt to secure the child seat to the vehicle seat in a tensioned configuration, and</p>	<p>seat to the vehicle seat in a tensioned configuration. <i>Boulevard 70 CS User Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="text-align: center;"> <p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <p>1 Open the locking tab. 2 Open the clamp.</p> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <p>1 Close the clamp over the vehicle belt. 2 Slide your palm or thumb along the locking tab until a click is heard.</p> </div> </div> <div style="text-align: center; margin-top: 20px;">  </div> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p> </div>

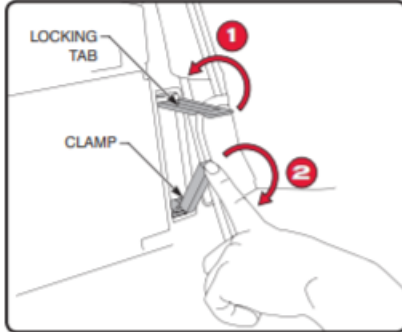
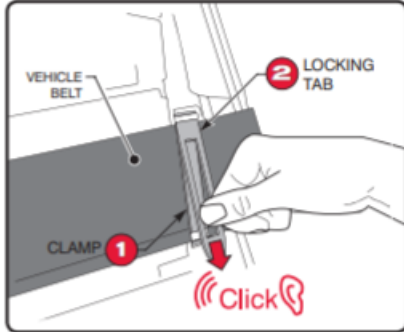
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="center"><i>Britax</i>  <i>Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>  (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat’s</i> tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams, and/or Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
[9(g)] wherein, in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt.	<i>Boulevard 70 CS</i> discloses or renders obvious that in each of the forward or rear-facing orientations, respective different portions of the first and second lateral edge surfaces of the tensioning mechanism displace the belt to apply tension to the belt. <i>Boulevard 70 CS User Guide</i> , p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> ; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

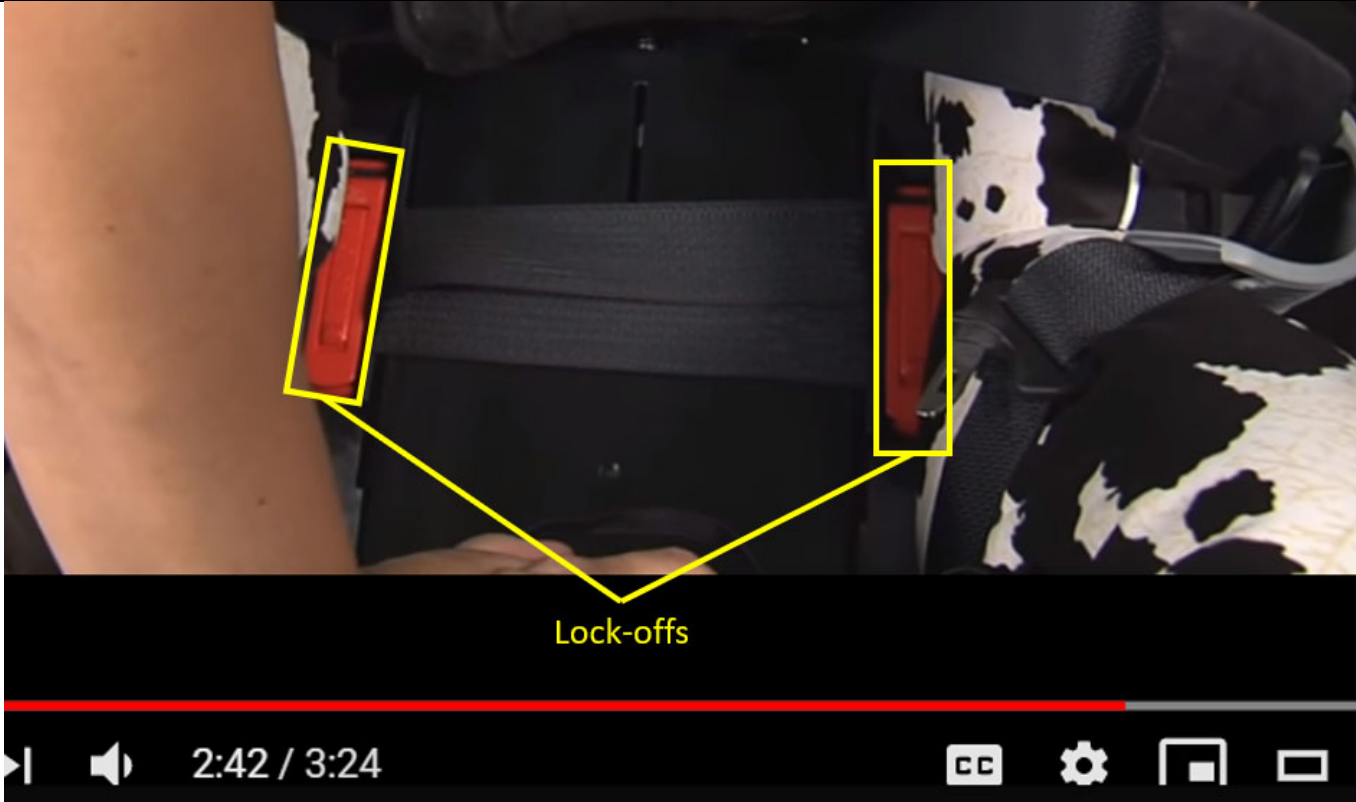
Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> <i>Both parts of the lock-off must be opened to secure a vehicle belt.</i></p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Boulevard 70 CS User Guide, p. 14.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>Lock-offs</p> <p>2:42 / 3:24</p> <p>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <div data-bbox="1276 362 1583 548"> <p>Diagram 4a shows a hand opening the locking tab. Diagram 4b shows a hand opening the clamp. Labels include 'LOCKING TAB' and 'CLAMP'.</p> </div> <div data-bbox="1276 561 1583 748"> <p>Diagram 5 shows a child's torso with a vehicle belt being routed through the rear-facing belt slots.</p> </div> <div data-bbox="1276 761 1583 948"> <p>Diagram 6 shows the buckle being closed. Diagram 7 shows the top part of the belt being pulled through the lock-off to remove slack.</p> </div>

*Id.*, p. 23.

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

### Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 9.</p>
[10(a)] The child seat according to claim 9, wherein the first belt path is configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path being configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>child seat to the vehicle seat when the child seat is in the rear-facing orientation,</p>	<div data-bbox="919 402 1270 451"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> </div> <div data-bbox="919 456 1270 560"> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> </div> <div data-bbox="919 565 1270 652"> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> </div> <div data-bbox="919 657 1270 847"> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> </div> <div data-bbox="919 860 1270 928"> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> </div> <div data-bbox="919 933 1585 1026"> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1276 362 1585 548"> <p>Diagram 4a shows a hand opening the locking tab. Diagram 4b shows a hand opening the clamp. Labels include 'LOCKING TAB' and 'CLAMP'.</p> </div> <div data-bbox="1276 565 1585 751"> <p>Diagram 5 shows a top-down view of a child's torso with a vehicle belt being routed through the rear-facing belt slots.</p> </div> <div data-bbox="1276 768 1585 954"> <p>Diagram 6 shows the buckle being closed. Diagram 7 shows the belt being pulled through the lock-off to remove slack.</p> </div>

*Boulevard 70 CS User Guide, p. 23.*

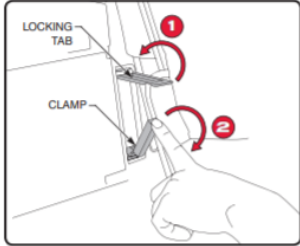
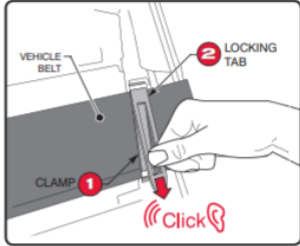

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div data-bbox="737 371 1694 1015"></div> <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

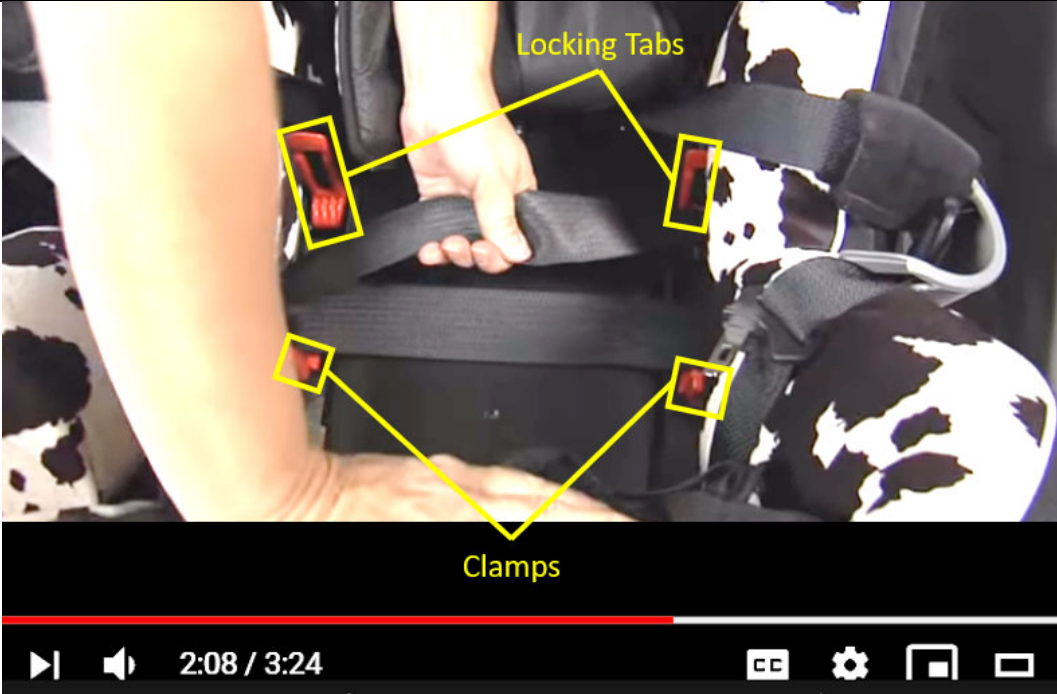
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p> <p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 10.</p>
[10(b)] wherein the second belt path is configured to allow a user	<p><i>Boulevard 70 CS</i> discloses or renders obvious the second belt path being configured to allow a user to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation. <i>Boulevard 70 CS User</i></p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

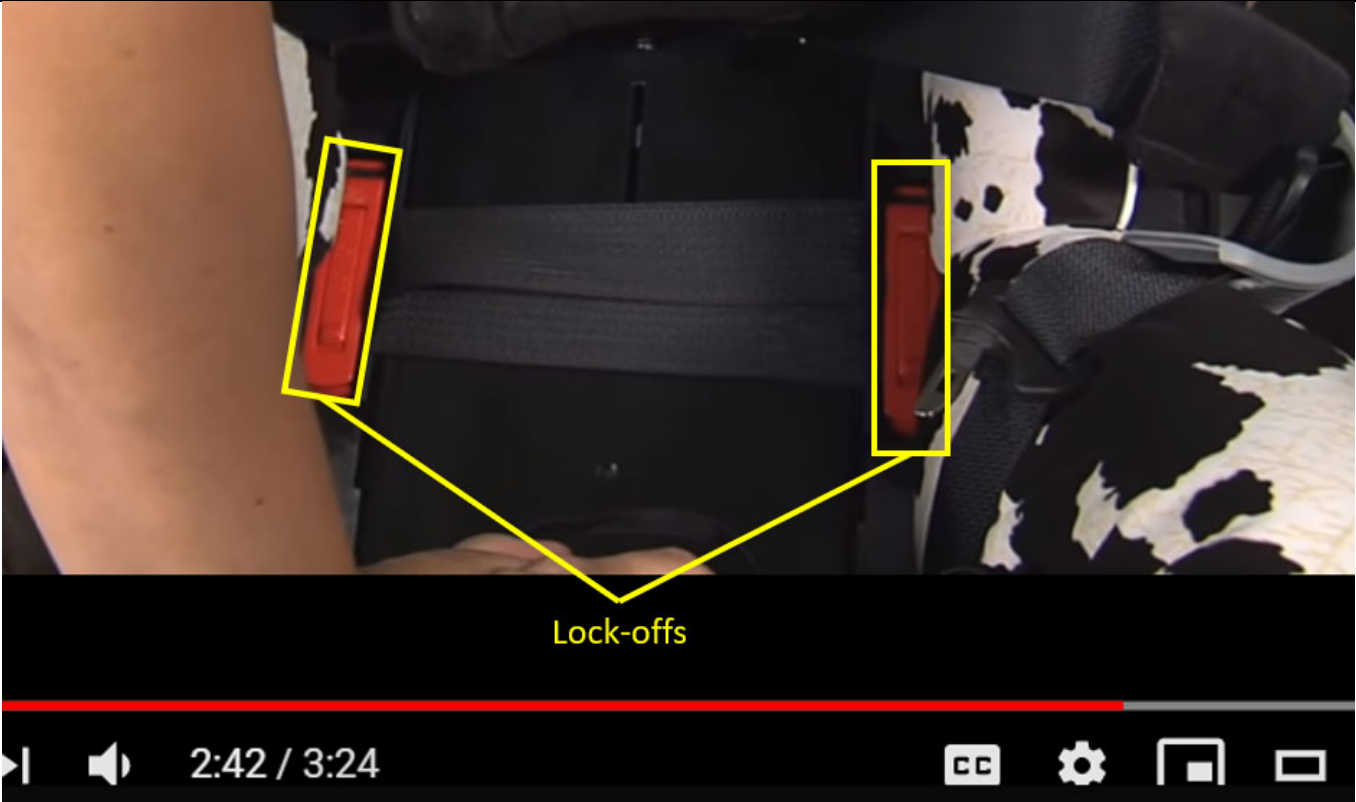
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
to position the vehicle belt to be displaced by the first and second lateral edge surfaces to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.	<p><i>Guide</i>, p. 14; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <p style="text-align: center;"><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> </div> <div style="text-align: center;"> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> </div> </div> <p style="text-align: center;"></p> <p style="text-align: center;"><i>Boulevard 70 CS User Guide</i>, p. 14.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<div data-bbox="722 337 1772 1026">A video frame showing a person's hands installing a car seat. The car seat is black with white cow print patterns. A black seat belt is being buckled into the car seat. Four yellow boxes with lines pointing to them are labeled 'Locking Tabs' and 'Clamps'. The video player interface at the bottom shows a red progress bar, a play button, a volume icon, the time '2:08 / 3:24', and icons for closed captions, settings, and full screen.</div> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “tensioning mechanism,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s tensioning mechanism, as discussed in element 1(b)(1).</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<p>See claim element 1(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 10.</p>
11. The child seat according to claim 10, wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.	<p>See claim 2.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 11.</p>
12. The child seat according to claim 10, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.	<p>See claim 3.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 12.</p>
[13(p)] A child seat configured to be secured	See claim element [1(p)].

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

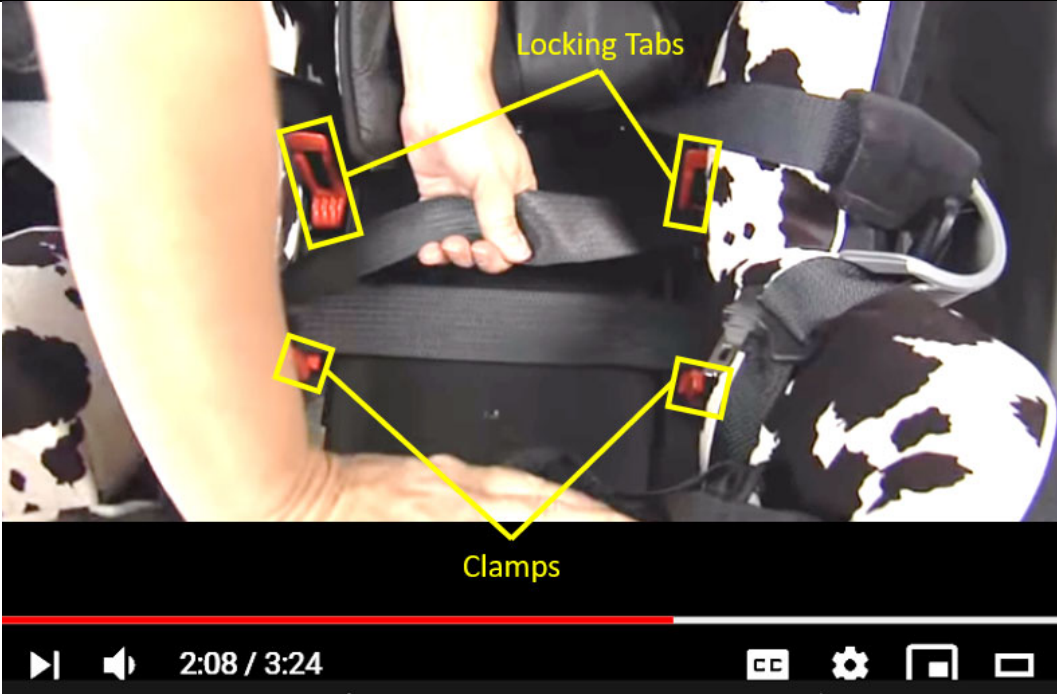
<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
to a vehicle seat in both a rear-facing and a forward-facing orientation by a belt of the vehicle seat, the child seat comprising:	The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(1)] a seat base comprising a seat portion, a backrest portion,	See claim element [1(a)(1)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(2)] a first belt path generally at a middle of the seat portion in a forward and rearward direction, and	See claim element [1(a)(3)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(3)] a second belt path generally at an intersection of the seat and backrest portions,	See claim element [1(a)(4)].  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
[13(a)(4)] first and second lateral edges that protrude forwardly and upwardly from opposing sides of the backrest portion proximate to the second belt path, third and fourth lateral edges that protrude	<i>Boulevard 70 CS</i> discloses or renders obvious the first and second lateral edges that protrude forwardly and upwardly from opposing sides of the backrest portion proximate to the second belt path, third and fourth lateral edges that protrude forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path. <i>Boulevard 70 CS User Guide</i> , p. 23, 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> ; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> .

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>forwardly and upwardly from opposing sides of the seat portion proximate to the first belt path;</p>	<div data-bbox="856 362 1270 1144"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1285 367 1661 596"> </div> <div data-bbox="1285 613 1661 844"> </div> <div data-bbox="1285 862 1661 1092"> </div>

*Boulevard 70 CS User Guide, p. 29.*


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p>The image is a video frame showing a person's hands installing a car seat. The car seat is black with white cow print patterns. The person is wearing a black shirt. The video player interface at the bottom shows a red progress bar, a play button, a volume icon, and a timestamp of 2:08 / 3:24. There are also icons for closed captions (CC), settings (gear), and full screen. Yellow annotations are present: 'Locking Tabs' with two yellow boxes pointing to red tabs on the seat belt, and 'Clamps' with two yellow boxes pointing to red clamps on the seat belt.</p> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <div data-bbox="1276 362 1583 548"> <p>Diagram 4a shows a hand opening the locking tab. Diagram 4b shows a hand opening the clamp. Labels include 'LOCKING TAB' and 'CLAMP'.</p> </div> <div data-bbox="1276 561 1583 748"> <p>Diagram 5 shows a child's torso with a vehicle belt being routed through the rear-facing belt slots.</p> </div> <div data-bbox="1276 761 1583 948"> <p>Diagram 6 shows the buckle being closed. Diagram 7 shows the top part of the belt being pulled through the lock-off to remove slack.</p> </div> <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(b)(1)] a pivot structure having a first pivot portion comprising a first lateral edge member and a second lateral edge member,	<p><i>Boulevard 70 CS</i> discloses or renders obvious a pivot structure having a first pivot portion comprising a first lateral edge member and a second lateral edge member. <i>Boulevard 70 CS User Guide</i>, p. 23, 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

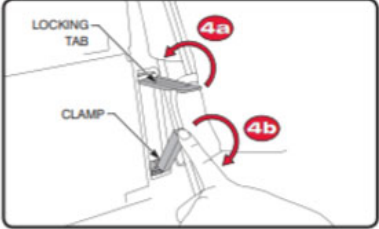
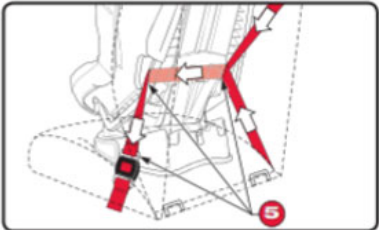

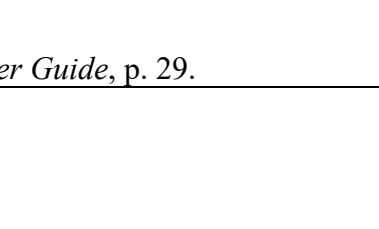

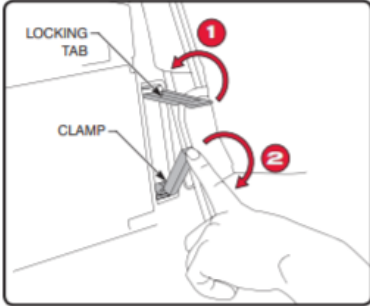
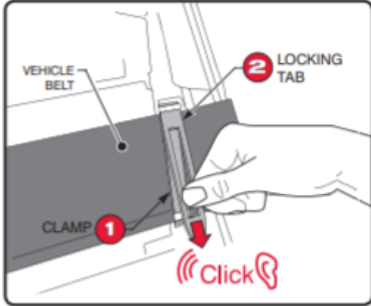
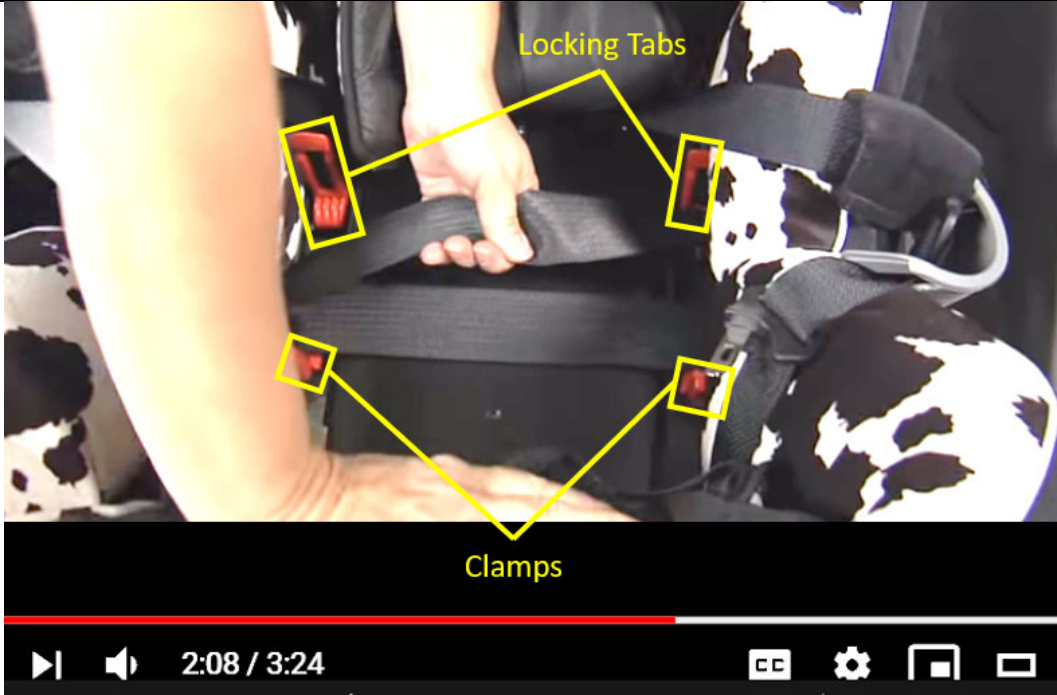
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> <i>Both the vehicle lap and shoulder belts must be routed through the lock-off.</i></p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p>      <p align="center"><i>Boulevard 70 CS User Guide, p. 29.</i></p>

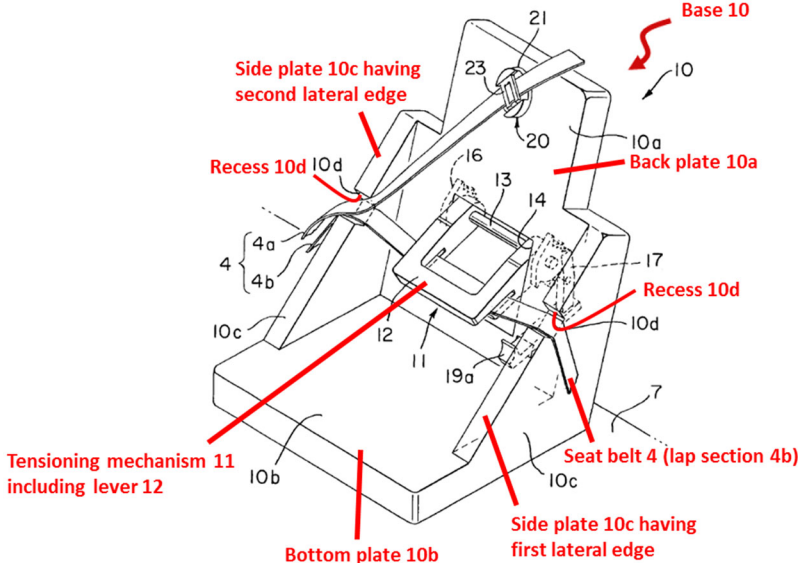
Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"> <li>1 Open the locking tab.</li> <li>2 Open the clamp.</li> </ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"> <li>1 Close the clamp over the vehicle belt.</li> <li>2 Slide your palm or thumb along the locking tab until a click is heard.</li> </ol> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>’s pivot structure. Furthermore, although <i>Yamazaki</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Yamazaki</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Yamazaki</i> discloses:</p> <p>“The base 10 is fastened to the passenger seat 7 by a lap-and-diagonal seat belt 4. The seat belt 4 has a diagonal section 4a extending between a tongue plate 5 (FIG. 5) to be engaged with a latch</p>

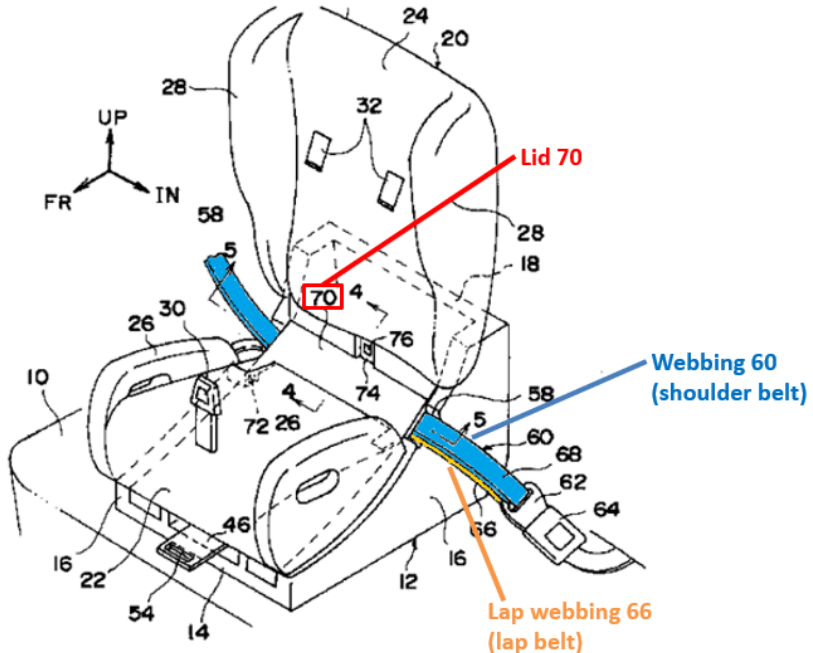
# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	<p data-bbox="1184 293 1314 326"><b>Prior Art</b></p> <p data-bbox="669 342 1892 448">6 (FIG. 5) connected to the floor of the vehicle and a retractor (not shown), and a lap section 4b extending between the tongue plate 5 (FIG. 5) and an anchor (fixed member) 9 (FIG. 5).”  <i>Yamazaki</i>, 3:30-36.</p> <p data-bbox="669 488 1913 594">“Step 1: The base 10 is set on the passenger seat 7 of the vehicle. Step 2: The tongue plate 5 of the seat belt 4 is engaged with the latch 6 with the lap section 4b of the seat belt 4 extended under the lever 12 of the seat belt tightening mechanism 11.” <i>Id.</i>, 4:27-32.</p>  <p data-bbox="1209 1260 1314 1292"><b>FIG. 1</b></p> <p data-bbox="1178 1300 1314 1333"><i>Id.</i>, Fig. 1.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>In another alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Washimi</i>’s pivot structure. Furthermore, although <i>Washimi</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Washimi</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Washimi</i> discloses:</p> <p>“In the straddle part 56, the webbing 60 is positioned with the lap webbing 66 and shoulder webbing 68 stacked together in a state where the tongue plate 62 is engaged with the buckle device 64.” <i>Washimi</i>, ¶[0023].</p> <p><i>Id.</i>, Fig. 1 (annotated).</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Claim	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1102 1015 1396 1047"><i>Id.</i>, Fig. 2 (annotated).</p> <p data-bbox="573 1088 1925 1266">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Wetter</i>’s pivot structure. Furthermore, although <i>Wetter</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Wetter</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Wetter</i> discloses:</p> <p data-bbox="667 1307 1883 1411">“During installation, both the lap and shoulder portions of an adult seat belt 136 for the vehicle seat 128, 130 are engaged round the belt guides 134 as shown in Figure 10. Next, a U-shaped strap deflecting member 138, which has its ends pivotally engaging in holes 140 and 142 in</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

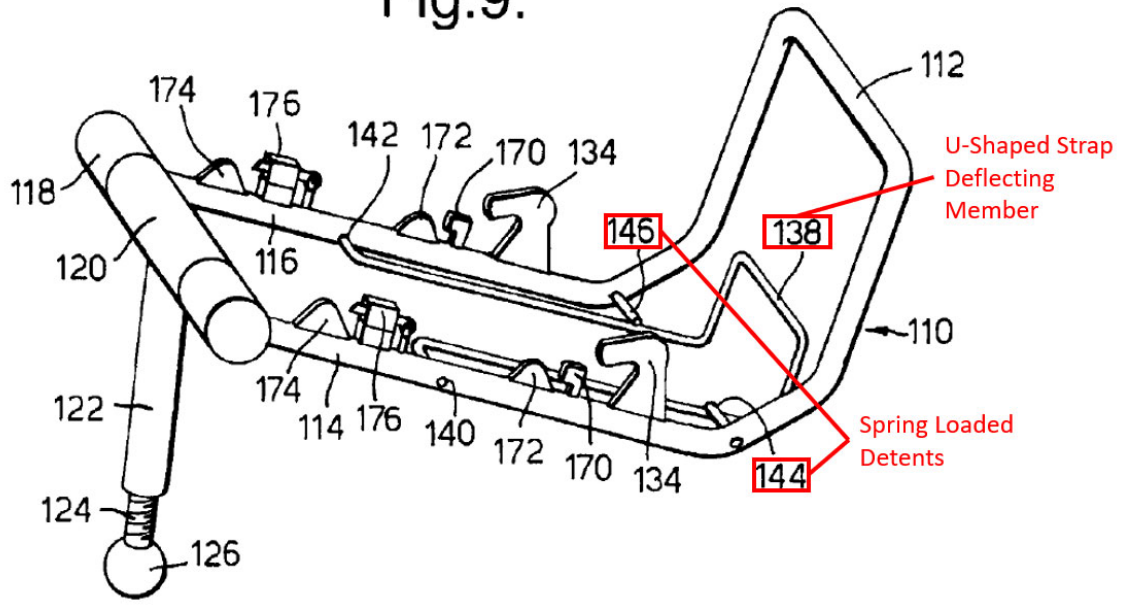
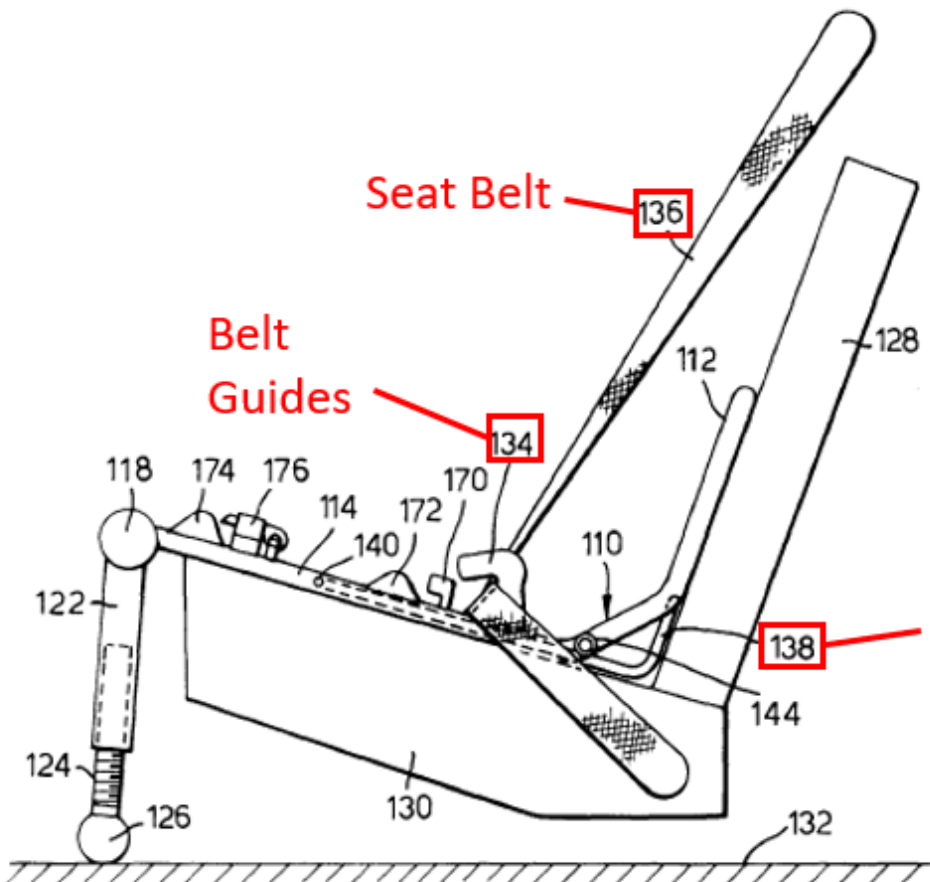
	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<p>the side limbs 114 and 116 of the base member, is pivoted downwardly from the position shown in Figure 10 to the position shown in Figure 11 in which it deflects the adult seat belt 136 downwardly between the belt guides 134, thereby tightening the belt 136 and compressing the springs of the seat cushion 130 of the vehicle seat. The deflection member 138 is held in the position shown in Figures 9 and 11 (in which it lies substantially parallel to the limbs 114 and 116 of the base member) by springloaded detents 144 and 146 on the base member 110 adjacent to the junctions between the central portion 112 and the end portions 114 and 116 respectively.”  <i>Wetter</i>, 5:6-23.</p> <p style="text-align: center;"><b>Fig.9.</b></p>  <p style="text-align: right;">U-Shaped Strap Deflecting Member</p> <p style="text-align: right;">Spring Loaded Detents</p> <p style="text-align: center;"><i>Id.</i>, Fig. 9 (annotated).</p>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>Fig.10.</p> <p>U-Shaped Strap Deflecting Member 138</p> <p>Seat Belt 136</p> <p>Belt Guides 134</p> <p>Id., Fig. 10 (annotated).</p>



Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	 <p data-bbox="1087 1299 1396 1339"><i>Id.</i>, Fig. 10 (annotated).</p> <p data-bbox="573 1372 1917 1445">In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with</p>

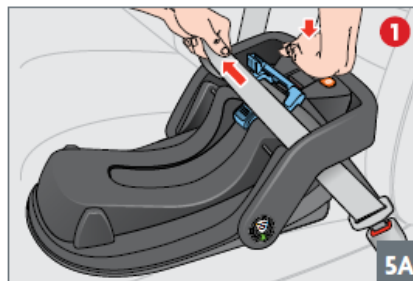
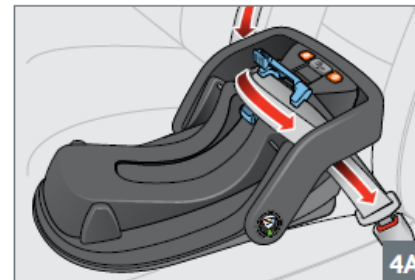
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<i>Uppa Baby Mesa's</i> pivot structure. Furthermore, although <i>Uppa Baby Mesa</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Uppa Baby Mesa's</i> pivot structure into <i>Boulevard 70 CS's</i> child seat. For example, literature disclosing the <i>Uppa Baby Mesa</i> discloses:



## SECURING THE BASE (LAP AND SHOULDER BELT INSTALLATION)

**STEP 4A:** Route the vehicle belt through the belt path while guiding the lap portion of the belt as close as possible to the top of the lock-off where the door hinges. Buckle the vehicle belt.



**STEP 5A:** Hold shoulder portion of belt above base. With one hand push down base in the direction of the seat bight (crease of seat) and hold firm as you pull shoulder belt **1**. While holding taut, slide shoulder belt back through the belt path as close as possible to the top of the lock-off **2**.

**NOTE: TIGHTNESS INDICATOR SHOULD BE GREEN.**



**STEP 6A:** Close the lock-off door.

**NOTE:** Check that the belt doesn't move more than 1 inch at belt path. If you are having trouble achieving a secure installation in the center seat position, please install using the locking clip (pg. 28).



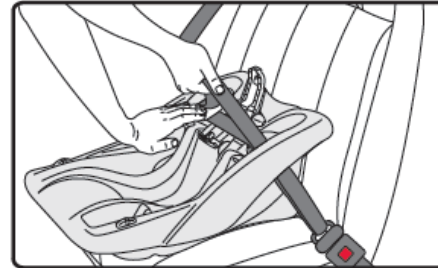
BASE INSTALLATION WITH VEHICLE SEAT BELT

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

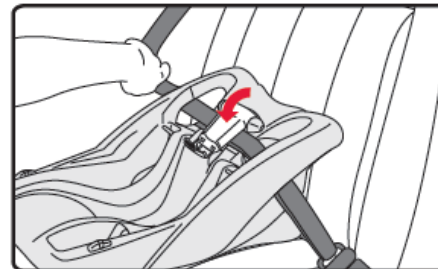
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p align="center">Uppa Baby Mesa Instruction Manual, p. 23.</p> <p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>B-Safe 35</i>’s pivot structure to satisfy this claim element. Furthermore, although <i>B-Safe 35</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>B-Safe 35</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>B-Safe 35</i> discloses:</p> <ul style="list-style-type: none"> <li>• <i>Place the base in the desired location on the vehicle seat and open the upper and lower portions of the lock-off.</i></li> <li>• <i>Pull the vehicle seat belt out.</i></li> </ul> <div data-bbox="1289 672 1715 932" data-label="Image"> </div> <ul style="list-style-type: none"> <li>• <i>Ensure that the vehicle seat belt is not twisted and then route the vehicle belt under and through the first belt guide, through the open lock-off and down through the second belt guide.</i></li> <li>• <i>Buckle the vehicle seat belt.</i></li> </ul> <div data-bbox="1289 948 1715 1208" data-label="Image"> </div> <div data-bbox="745 1240 825 1297" data-label="Image"> </div> <p align="center"><i>Britax B-Safe 35 User Guide, p. 16.</i></p>

### Installing the Base

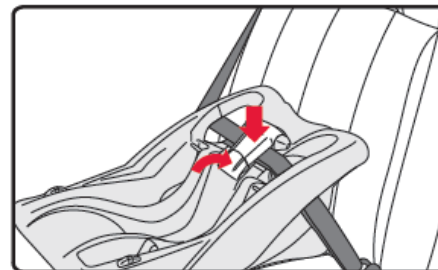
- Press the base firmly into the vehicle seat while removing all slack from first the lap portion and then the shoulder portion of the vehicle seat belt.



- Hold the vehicle belt tight and close the upper portion of the lock-off.



- Press firmly on the upper portion of the lock-off and close the lower portion to secure.

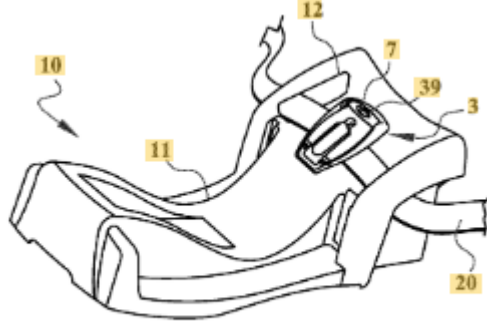
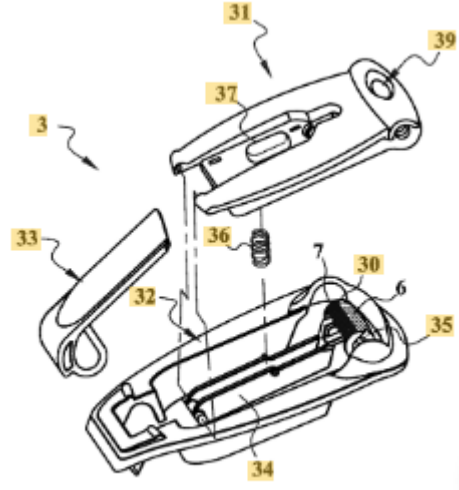


- Verify that the vehicle belt is tight and that the base is secure. The base is secure when it moves less than 1 inch (2.5 cm) front-to-back or side-to-side at the vehicle belt path.
- Correct recline angle is achieved when the green marker on each recline angle indicator is visible between the two lines.

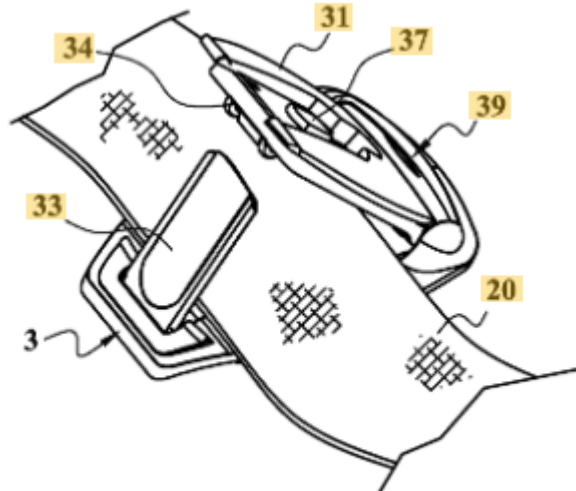
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p align="center"><i>Id.</i>, p. 17.</p> <p>In a further alternative, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved <i>the Boulevard 70 CS</i> with <i>Williams</i>’s pivot structure to satisfy this claim element. Furthermore, although <i>Williams</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Williams</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, <i>Williams</i> discloses:</p> <p>“Referring to FIG. 1, the base 10 may be formed integrally in one piece or an assembly of multiply piece, having a curved supporting surface 11 for support a infant travel seat thereon and a pair of side guiding openings 12 for allowing a belt passing therethrough so as to secure the base 10 to the vehicle seat. Referring to FIGS. 2 and 3, the biting compartment 32 is formed on the base 10 between the pair of side guiding openings 12 where the belt 20 could pass is passing thereover. The covering plate 31 has one end coaxial with the colored rotor 35 and pivoted to one end of the biting compartment 32 for closing the biting compartment 32 when being rotated to a closed position, and another end pivoted with a rotatable depressor 34 for pressing the belt 20 into the biting compartment 32 when the covering plate 31 is rotated to and positioned in the closed position. [P]referably, a resilient element 36 may be mounted between the covering plate 31 and the rotatable depressor 34, so as to keep the rotatable depressor 34 in an opened position. In one embodiment, the resilient element 36 is a compression spring for biasing the rotatable depressor 34 downward and keeping in the opened position. When the covering plate 31 is carrying the rotatable depressor 34 to press the belt 20, it would compress the resilient element 36 and cause the rotatable depressor 34 to rotate and close to the covering plate 31 to a closed position.” <i>Id.</i>, 2:49-3:7.</p> <p>“Referring to FIGS. 5 and 6, before tying the base <b>10</b> to a vehicle seat, the belt <b>20</b> is passing through the pair of side guiding openings <b>12</b> and secure its free end to an anchor which is</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>mounted within the vehicle seat. By this way, may secure the base <b>10</b> to the vehicle seat tightly.” <i>Id.</i>, 3:41-45.</p> <p>“In order to inhibit the sliding between the base <b>10</b> and belt <b>20</b>, the user may rotate the covering plate <b>31</b> to close the biting compartment <b>32</b>, thus would carry the rotatable depressor <b>34</b> to press the belt <b>20</b> into the biting compartment <b>32</b>. After being closed the covering plate <b>31</b>, the user may rotate the holding plate <b>33</b> to engage and lock the covering plate <b>31</b> in the closed position.” <i>Id.</i>, 3:16-52.</p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p align="center"><b>FIG. 1</b> <span style="margin-left: 200px;"><b>FIG. 2</b></span></p> <p align="center"><i>Id.</i>, FIGS. 1, 2.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

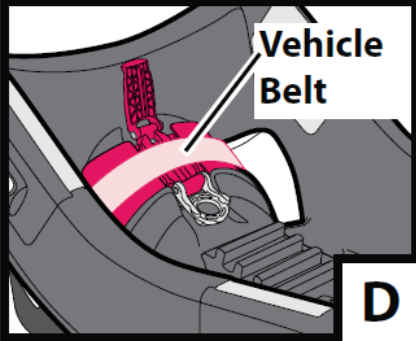

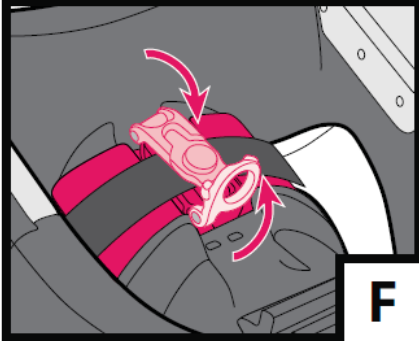

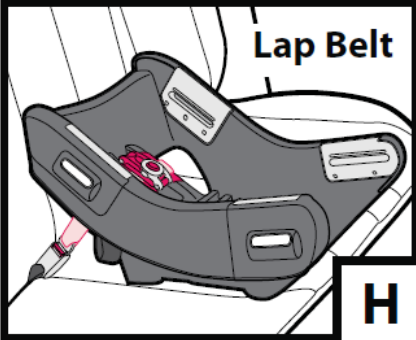
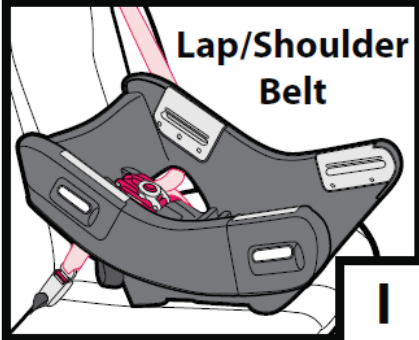
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="center"><b>FIG. 5</b></p> <p align="center"><i>Id.</i>, FIG. 5.</p> <p>In a further alternative, to the extent <i>the Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill in the art to have improved <i>the Boulevard 70 CS</i> with <i>Graco Smart Seat</i>’s pivot structure. Furthermore, although <i>Graco Smart Seat</i> teaches a pivot structure attached to the seat base, it would have been obvious to one of ordinary skill in the art to incorporate <i>Graco Smart Seat</i>’s pivot structure into <i>Boulevard 70 CS</i>’s child seat. For example, literature disclosing the <i>Graco Smart Seat</i> discloses:</p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>When using the vehicle seat belts to install the base, the lock-off is <b>ALWAYS</b> used to secure both belts of the lap or lap/shoulder belt.</p> <ol style="list-style-type: none"> <li>1. Position base in vehicle seat as shown <b>C</b>.</li> <li>2. Open the lock-off and route the vehicle belt through the belt path and over the lock-off <b>D</b>.</li> <li>3. Buckle seat belt. Pull up on shoulder belt while pushing down on base to tighten <b>E</b>.</li> <li>4. Close lock-off <b>F</b>.</li> <li>5. Test base for secure installation by moving front to back and left to right at the belt path <b>G</b>. Base should not move more than 1 inch ( 2.54 cm). If belt loosens or lengthens, repeat procedure.</li> </ol> <p>Lap Belt <b>H</b> and Lap/Shoulder Belt <b>I</b> should appear as shown when installed.</p> <p align="center"><b>30</b></p> <p align="center"><i>Graco Smart Seat Owner's Manual, p. 30.</i></p>

Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

	Invalidity Chart for U.S. Patent No. 9,586,504
Claim	Prior Art
	<div data-bbox="585 347 1003 688">  <p><b>D</b></p> </div> <div data-bbox="1035 347 1451 688">  <p><b>E</b></p> </div> <div data-bbox="1482 347 1902 688">  <p><b>F</b></p> </div> <div data-bbox="585 699 1003 1040">  <p><b>G</b></p> </div> <div data-bbox="1035 699 1451 1040">  <p><b>H</b></p> </div> <div data-bbox="1482 699 1902 1040">  <p><b>I</b></p> </div> <div data-bbox="1249 1065 1304 1102" data-label="Text"> <p>31</p> </div> <div data-bbox="1169 1141 1312 1180" data-label="Text"> <p><i>Id.</i>, p. 31.</p> </div> <div data-bbox="562 1214 1906 1435" data-label="Text"> <p>One of ordinary skill in the art would have been motivated to combine <i>the Boulevard 70 CS</i> with <i>Yamazaki, Washimi, Wetter, Uppa Baby Mesa, B-Safe 35, Williams</i>, and/or <i>Graco Smart Seat</i> because these references teach systems securing child seats to vehicle seats using securing mechanisms. The <i>Boulevard 70 CS</i> uses a pivot structure to ensure “that the child seat cannot be moved front to back or side to side more than 1 in. (2.5 cm) at the belt path. If the child seat is not secure, repeat installation or use a different seating location.” <i>Boulevard CS 70 User Guide</i>, p. 21, 23, 25, 27, 29, 31. As identified,</p> </div>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p>the installation of <i>Boulevard 70 CS</i>'s child seat can sometimes result in loose installations. <i>Id.</i> Therefore, a person of ordinary skill in the art would have looked to improve <i>Boulevard CS 70</i>'s locking tabs with one of the pivot structures disclosed in <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>.</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(b)(2)] the pivot structure attached to the backrest portion at an axis such that the pivot structure rotates between a first position and a second position pivotally about the axis, the first and second lateral edge members extending away from the backrest and substantially perpendicular to the axis,	<p><i>Boulevard 70 CS</i> discloses or renders obvious the pivot structure attached to the backrest portion at an axis such that the pivot structure rotates between a first position and a second position pivotally about the axis, the first and second lateral edge members extending away from the backrest and substantially perpendicular to the axis. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

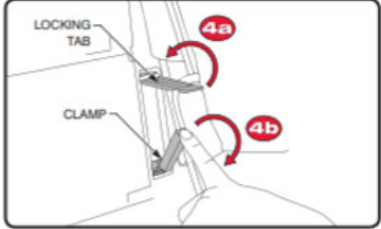
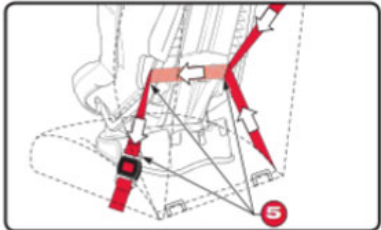

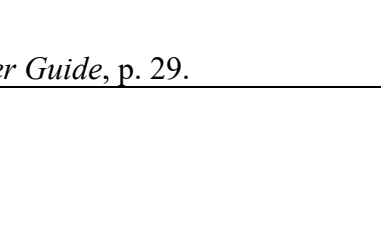
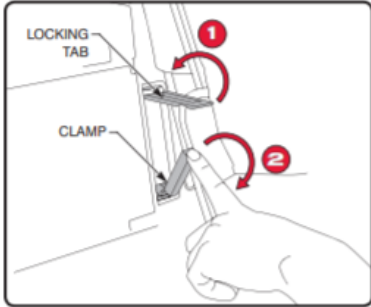
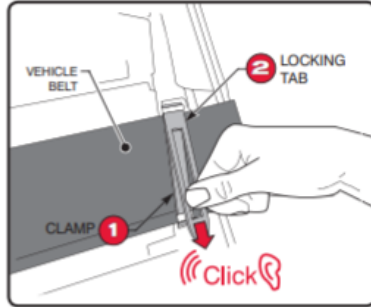
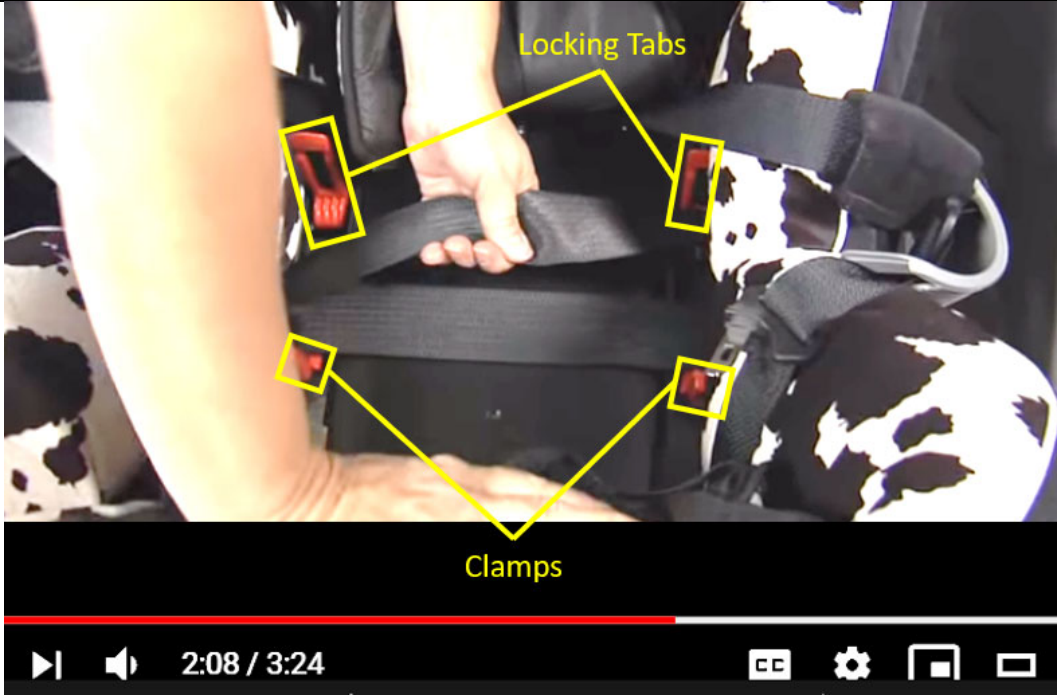
Claim	Invalidity Chart for U.S. Patent No. 9,586,504
	Prior Art
	<p><b>4</b> <i>Open the red lock-off closest to where the vehicle belt will be buckled.</i></p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> <i>Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</i></p> <p><b>6</b> <i>Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</i></p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> <i>Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</i></p>     <p><i>Boulevard 70 CS User Guide, p. 29.</i></p>

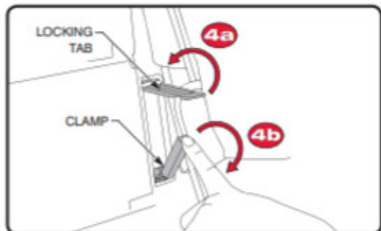
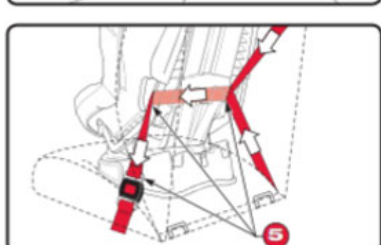
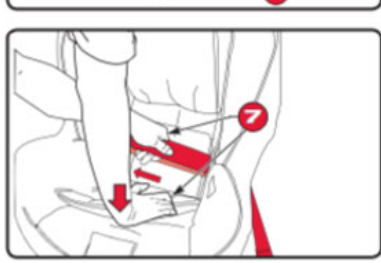
Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	<p><b>Using the Lock-Offs</b></p> <p><b>IMPORTANT:</b> Both parts of the lock-off must be opened to secure a vehicle belt.</p> <p><b>To Open:</b></p>  <ol style="list-style-type: none"><li>1 Open the locking tab.</li><li>2 Open the clamp.</li></ol> <p><b>To Close:</b></p>  <ol style="list-style-type: none"><li>1 Close the clamp over the vehicle belt.</li><li>2 Slide your palm or thumb along the locking tab until a click is heard.</li></ol> <p><b>14</b></p> <p><i>Id.</i>, p. 14.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i> (annotated).</p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(b)(3)] wherein in the first position, the first pivot portion is substantially adjacent to the seat base, and wherein	<p><i>Boulevard 70 CS</i> discloses or renders obvious that in the first position, the first pivot portion is substantially adjacent to the seat base, and wherein in the second position, the first pivot portion is at least partly displaced from the seat base in order to enable the second belt path to receive the belt. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

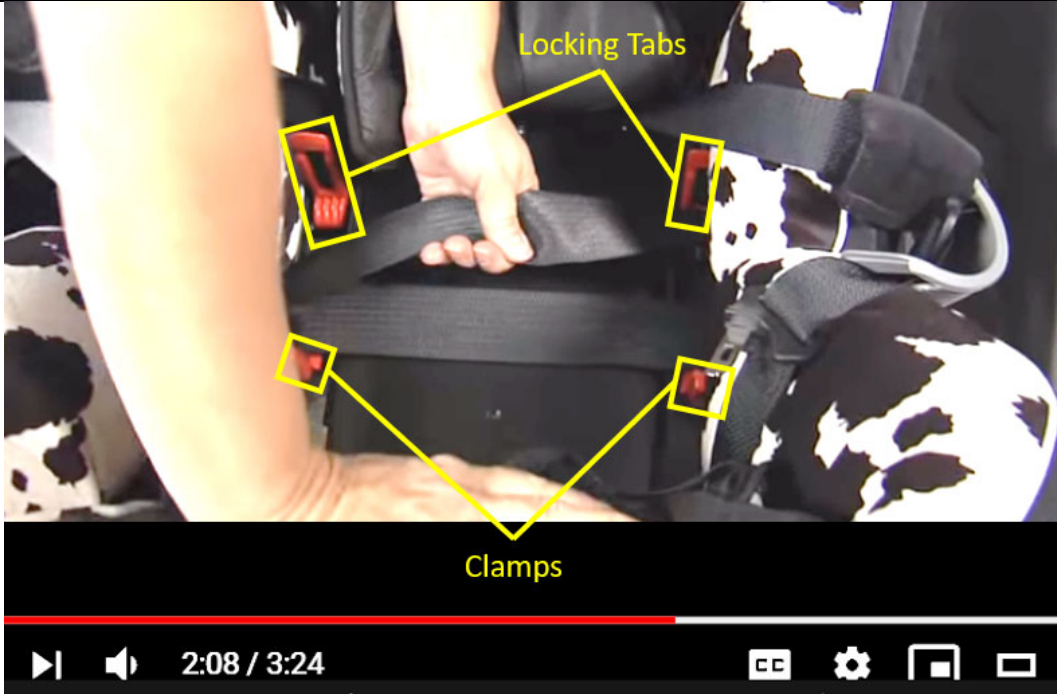
# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>in the second position, the first pivot portion is at least partly displaced from the seat base in order to enable the second belt path to receive the belt;</p>	<div data-bbox="856 363 1276 1143"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div data-bbox="1289 363 1667 1094">    </div>

Boulevard 70 CS User Guide, p. 29.

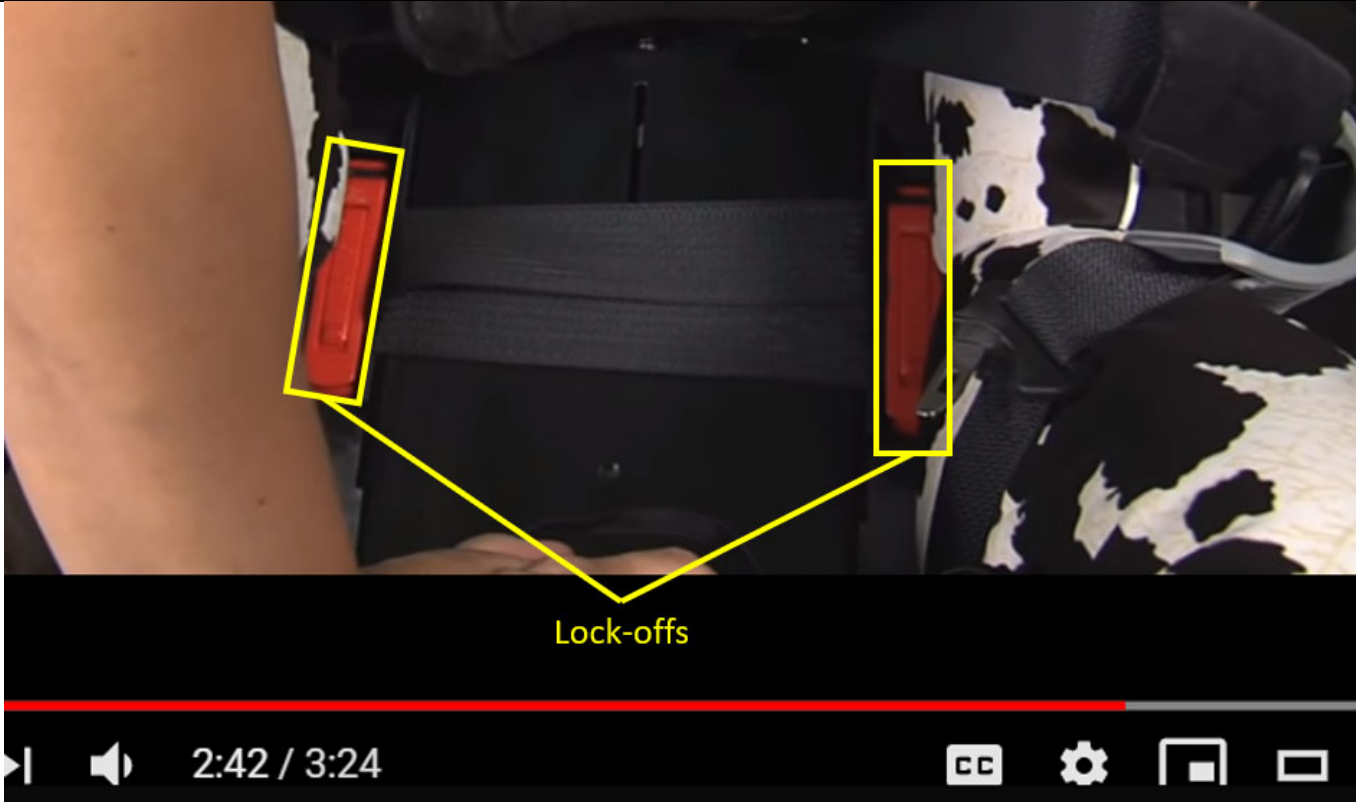


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

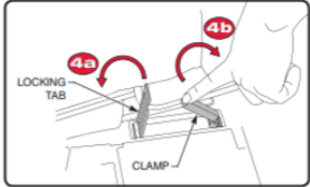


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p>



**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p align="center">Lock-offs</p> <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(c)(1)] the pivot structure having a second	<p><i>Boulevard 70 CS</i> discloses or renders obvious the pivot structure having a second pivot portion comprising a third lateral edge member and a fourth lateral edge member. <i>Boulevard 70 CS User Guide</i>,</p>

## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

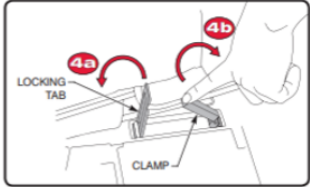


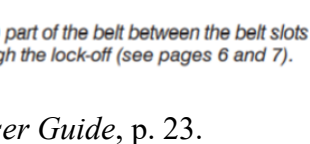
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>pivot portion comprising a third lateral edge member and a fourth lateral edge member,</p>	<p>p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 60%;"> <p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> </div> <div style="width: 35%;">    </div> </div>

*Boulevard 70 CS User Guide, p. 23.*


**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(c)(2)] the third and fourth lateral edge members moving between a third position proximate to the seat portion and a fourth position at least partly displaced from the	<p><i>Boulevard 70 CS</i> discloses or renders obvious the third and fourth lateral edge members moving between a third position proximate to the seat portion and a fourth position at least partly displaced from the seat portion in order to enable the first belt path to receive the belt. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>


# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>seat portion in order to enable the first belt path to receive the belt,</p>	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>     <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>

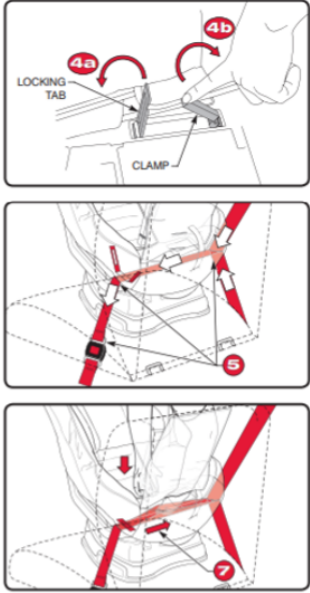
**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504


Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>The <i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(d)] wherein the first belt path is configured to allow a user to position the belt to be displaced by the third and fourth lateral edge members relative to the third and fourth lateral edges to secure the child seat to the vehicle seat when the child seat is in	<p><i>Boulevard 70 CS</i> discloses or renders obvious the first belt path being configured to allow a user to position the belt to be displaced by the third and fourth lateral edge members relative to the third and fourth lateral edges to secure the child seat to the vehicle seat when the child seat is in the rear-facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 23; <i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
the rear-facing orientation, and	<p><b>IMPORTANT:</b> Ensure the buckle is in inner slot and lying away from the belt path.</p> <p><b>4</b> Open the blue lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the rear-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the middle of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p>  <p><i>Boulevard 70 CS User Guide, p. 23.</i></p>




**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

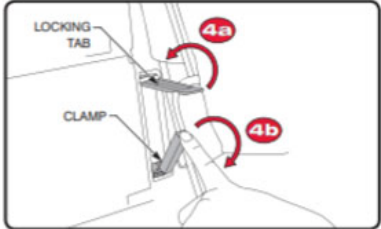
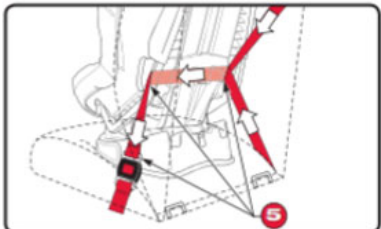

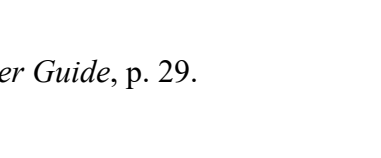
Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p>



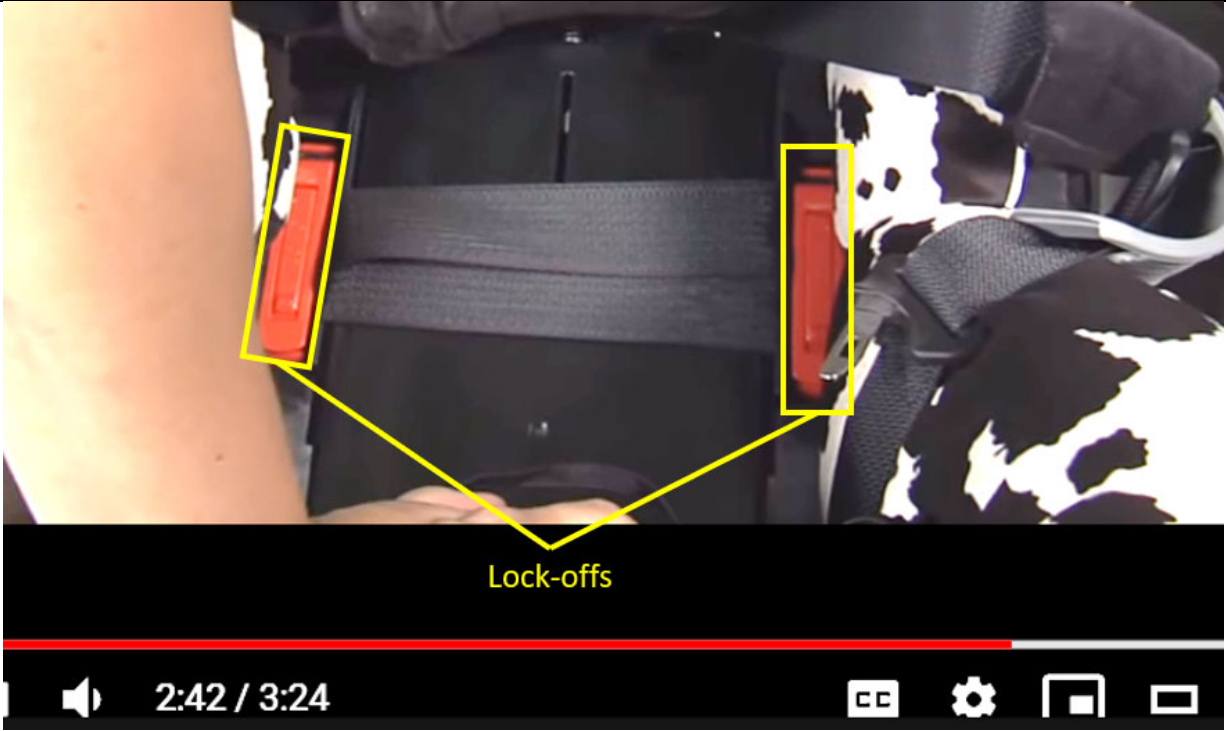
## Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Rear Facing Installation using Lap/Shoulder Belt and Two Lock-Offs.</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s pivot structure, as discussed in element 13(b)(1).</p> <p>See claim element 13(b)(1) for the motivation to combine.</p> <p><i>Boulevard 70 CS</i>, alone or in combination with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>, thus discloses or renders obvious this limitation of claim 13.</p>
[13(e)] wherein the second belt path is configured to allow the user to position	<p><i>Boulevard 70 CS</i> discloses or renders obvious the second belt path is configured to allow the user to position the belt to be displaced by the first and second lateral edge members relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-</p>

# Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
<p>the belt to be displaced by the first and second lateral edge members relative to the first and second lateral edges to secure the child seat to the vehicle seat when the child seat is in the forward-facing orientation.</p>	<p>facing orientation. <i>Boulevard 70 CS User Guide</i>, p. 29; <i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs</i>.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 60%;"> <p><b>4</b> Open the red lock-off closest to where the vehicle belt will be buckled.</p> <p>a Open the locking tab b Open the clamp</p> <p><b>5</b> Route the vehicle belt through the forward-facing belt slots, then buckle. Ensure the vehicle belt is not twisted.</p> <p><b>6</b> Push down into the rear of the child seating area with moderate force while removing all slack from the bottom (lap) part of the vehicle belt and close the lock-off.</p> <p>a Close the clamp over the vehicle belt b Slide your palm or thumb along the locking tab until a click is heard (see page 14)</p> <p><b>IMPORTANT:</b> Both the vehicle lap and shoulder belts must be routed through the lock-off.</p> <p><b>7</b> Push down into the middle of the child seating area with moderate force while pulling the top (shoulder) part of the belt between the belt slots to remove any remaining slack through the lock-off (see pages 6 and 7).</p> <p style="text-align: right;"><i>Boulevard 70 CS User Guide</i>, p. 29.</p> </div> <div style="width: 35%;">     </div> </div>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

Invalidity Chart for U.S. Patent No. 9,586,504	
Claim	Prior Art
	 <p><i>Britax Convertible Car Seats: Forward Facing Installation using Lap/Shoulder Belt and Two Lock-Offs (annotated).</i></p> <p>Alternatively, to the extent the <i>Boulevard 70 CS</i> fails to disclose a “pivot structure,” as claimed, it would have been obvious to one of ordinary skill the art to have improved the <i>Boulevard 70 CS</i> with <i>Yamazaki</i>, <i>Washimi</i>, <i>Wetter</i>, <i>Uppa Baby Mesa</i>, <i>B-Safe 35</i>, <i>Williams</i>, and/or <i>Graco Smart Seat</i>’s pivot structure, as discussed in element 13(b)(1).</p> <p>See claim element 13(b)(1) for the motivation to combine.</p>

**Exhibit B3 – Invalidity Contentions Claim Chart for U.S. Patent No. 9,586,504**

<b>Invalidity Chart for U.S. Patent No. 9,586,504</b>	
<b>Claim</b>	<b>Prior Art</b>
	<i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 13.
14. The child seat according to claim 13, wherein the first belt path extends transversely with respect to a longitudinal axis of the child seat across the seat portion of the seat base.	See claim 2.  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 14.
15. The child seat according to claim 13, wherein the second belt path extends transversely with respect to a longitudinal axis of the child seat across the backrest portion of the seat base.	See claim 3.  The <i>Boulevard 70 CS</i> , alone or in combination with <i>Yamazaki</i> , <i>Washimi</i> , <i>Wetter</i> , <i>Uppa Baby Mesa</i> , <i>B-Safe 35</i> , <i>Williams</i> , and/or <i>Graco Smart Seat</i> , thus discloses or renders obvious this limitation of claim 15.